



**DRAFT**

CITY OF WALLA WALLA

# HISTORIC PRESERVATION PLAN

**JULY 2022**

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**NORTHWEST VERNACULAR**  
HISTORIC PRESERVATION

## Credits and Acknowledgements

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## Glossary of Frequently Used Terms and Acronyms

<b>Archaeological sites, resources, and objects</b>	These terms are sometimes used interchangeably and it can be confusing. According to the Archaeological Sites and Resources Act (RCW 27.53) archaeological resources are defined as: All sites, objects, structures, artifacts, implements, and locations of prehistorical or archaeological interest, whether previously recorded or still unrecognized, including, but not limited to, those pertaining to prehistoric and historic American Indian or aboriginal burials, campsites, dwellings, and habitation sites, including rock shelters and caves, their artifacts and implements of culture such as projectile points, arrowheads, skeletal remains, grave goods, basketry, pestles, mauls and grinding stones, knives, scrapers, rock carvings and paintings, and other implements and artifacts of any material that are located in, on, or under the surface of any lands or waters owned by or under the possession, custody, or control of the state of Washington or any county, city, or political subdivision of the state are hereby declared to be archaeological resources.
<b>Built Environment</b>	Above-grade historic resources including sites, buildings, structures, objects, and districts that are not in a state of ruin.
<b>CLG</b>	Certified Local Government
<b>Commission</b>	City of Walla Walla Historic Preservation Commission
<b>CTUIR</b>	Confederated Tribes of the Umatilla Indian Reservation
<b>DAHP</b>	Washington State Department of Archaeology and Historic Preservation
<b>DOE</b>	Determination of Eligibility
<b>DNE</b>	Determination of Not Eligible
<b>FEMA</b>	Federal Emergency Management Agency
<b>HABS</b>	Historic American Buildings Survey
<b>HAER</b>	Historic American Engineering Record
<b>HALS</b>	Historic American Landscapes Survey
<b>HPC or Commission</b>	City of Walla Walla Historic Preservation Commission
<b>HTC</b>	Federal 20% Historic Rehabilitation Tax Credit
<b>IDP</b>	Inadvertent Discovery Plan
<b>ILS</b>	Intensive Level Survey
<b>GIS</b>	Geographic Information System
<b>HMP</b>	Walla Walla County Multi-Jurisdictional Hazard Mitigation Plan
<b>MPS</b>	Multiple Property Submission



<b>NAGPRA</b>	Native American Graves Protection and Repatriation Act
<b>NDE</b>	No Determination of Eligibility
<b>NEPA</b>	National Environmental Policy Act
<b>NHPA</b>	National Historic Preservation Act
<b>NPS</b>	National Park Service
<b>NRHP</b>	National Register of Historic Places
<b>NWV</b>	Northwest Vernacular, Inc.
<b>RCW</b>	Revised Code of Washington
<b>RLS</b>	Reconnaissance Level Survey
<b>SEPA</b>	State Environmental Policy Act
<b>SHPO</b>	State Historic Preservation Office (or Officer)
<b>SMA</b>	Shoreline Management Act
<b>SPV</b>	Washington State Special Valuation Program
<b>THPO</b>	Tribal Historic Preservation Office (or Officer)
<b>Traditional Cultural Property/Place (TCP)</b>	WAC 365-195-450 defines traditional cultural property as property which has traditional cultural significance. It is associated with the cultural practices or beliefs of a living community that are rooted in that community's history, and are important in maintaining the continuing cultural identity of the community.
<b>URM</b>	Unreinforced Masonry Building
<b>WAC</b>	Washington Administrative Code
<b>WHR</b>	Washington Heritage Register
<b>WISAARD</b>	Washington Information System for Architectural and Archaeological and Records Data
<b>WWRHP or local register</b>	City of Walla Walla Register of Historic Places
<b>WWMC</b>	Walla Walla Municipal Code

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# Contents

	Credits and Acknowledgements	3
	Glossary of Frequently Used Terms and Acronyms	4
	List of Tables and Figures	9
<b>1.</b>	<b>Executive Summary</b>	<b>11</b>
	1.1. Plan Purpose	11
	1.2. Plan Process & Findings	12
	1.3. Summary of Goals and Recommendations	13
<b>2.</b>	<b>Historic Context</b>	<b>15</b>
	2.1. Development Periods	15
	2.2. Types, Functions, and Forms	29
	2.3. Architectural Styles	34
<b>3.</b>	<b>Current Status of Historic Preservation</b>	<b>42</b>
	3.1. Preservation Laws	42
	3.2. Local Preservation Program	44
	3.3. Survey and Inventory	46
	3.4. Historic Registers	51
	3.5. City Integration	56
	3.6. Incentives	62
<b>4.</b>	<b>Goals, Policies, and Proposals</b>	<b>70</b>
	4.1. Vision Statement	70
	4.2. Mission Statement	70
	4.3. Goals	70
<b>5.</b>	<b>Recommendations</b>	<b>77</b>
	5.1. Programmatic Updates	77
	5.2. Survey and Inventory	80
	5.3. City Integration	85
<b>6.</b>	<b>Action Plan</b>	<b>95</b>
<b>7.</b>	<b>Bibliography</b>	<b>109</b>

<b>8. Appendices</b>	<b>113</b>
8.1. Community Survey	113
8.2. Community Survey Results	117
8.3. Additional Maps	119
8.4. Incentives Program Requirements	134
8.5. Ordinance Language Updates	137
8.6. Bylaws Language Updates	141



## List of Tables and Figures

Table 1. Key Built Environment Surveys	47
Table 2. City Parks and Trails	49
Table 3. Local Register Designated Properties	52
Table 4. Districts Listed to the NRHP and WHR	54
Table 5. Individually Listed to the NRHP and WHR	54
Table 6. WHR Listed Property	55
Table 7. Applicable NRHP Multiple Property Submissions	56
Table 8. HTC Projects	63
Table 9. SPV Projects	65
Table 10. WWRHP Properties to Confirm	80
Table 11. Langford's Addition Potential Resource Count	83
Table 12. Green's First Addition Potential Resource Count	83
Table 13. Roberts Addition Potential Resource Count	83
Table 14. Cain's First Addition Potential Resource Count	84
Table 15. Reed's First Addition Potential Resource Count	84
Table 16. South Park Addition Potential Resource Count	84
Table 17. Babcock's Addition Potential Resource Count	85
Table 18. Bryant's Addition, et al Potential Resource Count	85
Table 19. Isaac's Addition, et al Potential Resource Count	85
Map 1. Annexations by development period.	120
Map 2. Subdivisions by development period.	121
Map 3. Fort Walla Historic District.	122
Map 4. National Register and Washington Heritage Register properties	123
Map 5. Walla Walla Register properties.	124
Map 6. Previous survey areas.	125
Map 7. HPI form locations.	126
Map 8. URM Inventory.	127
Map 9. Walla Walla 2020 researched properties.	128
Map 10. Recommended survey areas.	129
Map 11. Detailed survey area recommendations (areas 1,2, and 5).	130
Map 12. Detailed survey area recommendations (areas 3, 4, and 6).	131
Map 13. Detailed survey area recommendations (areas 7, 8, and 9).	132
Map 14. Proximity of Umatilla Reservation to Walla Walla.	133

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# 1. Executive Summary

## 1.1. PLAN PURPOSE

A historic preservation plan is a city planning document intended to analyze the present state of the city's historic preservation program and provide a road map for the programming as it moves forward. Historic preservation is about ensuring the heritage and historic places that enrich our lives remain for future generations. Preserving historic places (buildings, structures, objects, sites) highlights what's already valued in Walla Walla by both residents and visitors. A historic preservation is the result of a collaborative process to understand the current program, identify what works well and what can be improved, and form a vision, goals, and an action plan for historic preservation in a community. A historic preservation plan is a city planning document that will guide the city's historic preservation program and provide a roadmap to achieving its goals.

The city of Walla Walla is a vibrant community with a rich history—some of the oldest built environment resources in the state are present in the city. It is also an important place to the Confederated Tribes of the Umatilla Indian Reservation (CTUIR). As a result, Walla Walla's cultural resources can illustrate the breadth and depth of city and region's history—from the early stewardship of the land by the ancestors of the CTUIR to the viticulture that has helped revitalized the community. When it established a historic preservation ordinance in 2002 and became a Certified Local Government (CLG) in 2003, the City of Walla Walla acknowledged this heritage and began to take steps to preserve it for future generations. This has occurred both within the City's preservation program (e.g., the design review process managing change to locally designated properties, the recent National Register of Historic Places designation of the Downtown Walla Walla Historic District) and outside its guidance (e.g., establishment of Walla Walla 2020 and the flourishing of the Washington Main Street Program through the Downtown Walla Walla Foundation). The structure for historic preservation that is already in place can support additional policies to strengthen the historic preservation ordinance and Historic Preservation Commission (HPC) and propel the program forward.

There are numerous benefits to historic preservation, from enhanced quality of life and fostering awareness of a community's heritage to economic advantages and environmental considerations. There are four key areas where historic preservation can benefit a community: social, cultural, environmental, and economic.

**Social.** Cultural resources are often touchstones for communities. These resources are recognized and known entities within their community, whether that is land associated with traditional cultural practices, a park that generations have visited with family and friends, or a commercial building that has housed a highly regarded legacy small business. Cultural resources provide an opportunity to learn about our shared past, how we as individuals relate to it and how we can move forward. Retaining cultural resources allows communities to engage with their past, acknowledging the good, the bad, and the complicated stories in an authentic and meaningful way. The National Trust for Historic Preservation's African American Cultural Heritage Action Fund is one example of an organization deciding that, "Historic sites that illuminate these truths create authentic spaces for our society to make amends and begin healing," according to executive director Brent Leggs.<sup>1</sup>

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<sup>1</sup> Lawana Holland-Moore, "Processing a Painful Past Through Historic Places," *The National Trust for Historic Preservation*, May 24, 2021, <https://savingplaces.org/stories/processing-a-painful-past-through-historic-places#.Ysym-sOzMlrk>.



**Cultural.** Many cultural resources are valuable for their architectural design, connection with important events in history, or association with indigenous tribes and significant people(s). Other cultural resources have ongoing meaning for their expression of a community's culture, whether it's art, history, or religion. Preserving resources of cultural significance demonstrates the value that differing cultures provide to an entire community.

**Environmental.** As our communities and the world grapple with the effects of climate change and seek environmental sustainability, historic preservation can support these efforts. Reusing historic buildings and structures recognizes the embodied energy inherent to these resources and reduces what is taken to the landfill. Rehabilitating a historic building is more labor-intensive than materials-intensive, places value on the craftsmanship of the past and provides opportunities for compatible energy efficiency upgrades that support long-term retention of the resource.

**Economic.** There are a number of economic benefits to historic preservation. The labor intensiveness of reusing historic buildings creates local jobs. Cultural resources provide a rich setting for businesses and events that draws residents and tourists, encouraging investment in local economies. Historic multiple-family buildings can provide examples of compatible approaches to long-term increased density. Historic properties tend to have stable property values allowing them to weather economic crises. PlaceEconomics, a private-sector firm that has studied the economic impacts of historic preservation, has numerous studies published and available on their website at [PlaceEconomics](https://www.placeeconomics.com/).

## 1.2. PLAN PROCESS & FINDINGS

This historic preservation plan is the result of collaboration between the City of Walla Walla, historic preservation consultants Northwest Vernacular (NWV), the Walla Walla Historic Preservation Commission (HPC), key stakeholders, and the Walla Walla community.

The City of Walla Walla hired NWV in December 2021 and held an initial introduction and kick-off session via Zoom with the City staff on January 4, 2022. NWV began their work by collecting relevant GIS data from the City of Walla Walla, Walla Walla County, the Federal Emergency Management Agency



(FEMA), and the Washington State Department of Archaeology and Historic Preservation (DAHP) to review development patterns, listed resources, and previous cultural resource inventory efforts. They then reviewed the city's historic preservation program, relevant ordinances, and associated planning documents (e.g., the most recent update to the Comprehensive Plan). They also briefly summarized the city's history from previously published sources—organizing it within development periods—and identified architectural trends in the city.

The HPC and NWV conducted the initial community outreach meeting on February 1, 2022. This public meeting was conducted as a hybrid Zoom and in-person gathering due to the COVID-19 pandemic.

NWV worked with City planning and support services staff to develop community survey questions to understand the perception of historic preservation in Walla Walla. City support services staff created the questionnaire with the online tool SurveyMonkey. The survey remained open from January 31, 2022, to February 25, 2022, and received 495 responses. The full list of questions included in the survey and an analysis of the responses are included in Appendices A and B, respectively. Ultimately, respondents indicated that historic preservation greatly benefits community character and heritage tourism. Sustainability and economic development were also considered benefits of historic preservation but were not rated as highly as community character and heritage tourism. A notable metric from the survey was that only 17% of respondents believed the City of Walla Walla is doing enough to support and encourage historic preservation. Common responses included a desire for more public education and outreach and increased incentives and assistance for historic properties to keep them in active use and well maintained. There were mixed responses on how to tackle more inclusive history, with some respondents concerned about a need to expand the narrative around Walla Walla's history (i.e., more inclusivity of Tribal history and underrepresented communities) while others expressed concern about removing statues and rewriting history. These thoughts were considered in preparing the recommendations as well as the goals, policies, and proposals.

NWV, in consultation with City of Walla Walla staff and the HPC, developed a list of key stakeholders and conducted individual and group Zoom interviews in March and April of 2022 with those stakeholders. Stakeholders included area historians, historic property owners, and cultural resource workers. The full list is included in Credits and Acknowledgments.

NWV submitted an initial draft for HPC review in March 2022. After conducting the stakeholder interviews and reviewing the community survey results, NWV incorporated the edits received from the HPC and drafted goals, policies, and proposals for the historic preservation plan. NWV submitted the second draft to the City and HPC for review, who forwarded it on to DAHP for review.

### 1.3. SUMMARY OF GOALS AND RECOMMENDATIONS

After reviewing the city's program and related ordinances, the Historic Preservation Element in the Comprehensive Plan, and communicating with a group of stakeholders, NWV identified a vision statement, mission statement, and five goals to guide ongoing work by the City's historic preservation program. NWV also drafted a series of recommendations that help the City implement supporting policies and pursue the goals.

**Vision statement:** Walla Walla will work with stakeholders to seek ways to celebrate and preserve its unique character while adapting to change.

**Mission statement:** Walla Walla's historic preservation program will protect and honor the city's diverse cultural resources through broad and deep public outreach and consistent application of the historic preservation ordinance.

The five goals to guide the program are:

**Goal 1:** Identify, evaluate, and nominate cultural resources.

**Goal 2:** Protect cultural resources.

**Goal 3:** Inform Walla Walla residents and provide access to information on historic preservation in the city.

**Goal 4:** Promote historic preservation as an essential aspect to economic vitality.

**Goal 5:** Ensure authenticity guides heritage tourism in Walla Walla.

The recommendations are divided into four overarching categories: programmatic updates, survey and inventory, city planning integration, and economic promotion. These categories not only organize the recommendations but reflect key elements that can drive Walla Walla's historic preservation forward. Programmatic updates are process-related and include updates to the historic preservation ordinance, the organization of the historic preservation commission and its bylaws, and the local register. The recommendations for future survey and inventory work will help maintain the city's awareness of historic resources throughout the city limits. City planning integration recommendations aim to add and/or improve City policies in their approach to cultural resources, whether that's zoning or consultation with Tribes and other agencies. And finally, the economic promotion recommendations are intended to strengthen the connection between economic well-being and historic preservation.

## 2. Historic Context

The historic context is not a complete history of Walla Walla, but it provides a summary of the city's founding and development in the context of the built environment.

This chapter features three sections: development periods; resource types, functions, and forms; and architectural styles. The development periods section summarizes Walla Walla's built environment history, organizing it into stages based on shared development patterns or trends. This section relies on previously published histories, historic context statements from historic property survey reports, significance statements from National Register and Walla Walla Register of Historic Places nominations, and research available on the Walla Walla 2020 website. The functions and forms section identifies common and notable functions (e.g., domestic, commercial) and building forms present in Walla Walla. It addresses how their location, characteristics, and construction tie in to the city's history. The architectural styles section provides brief summaries of popular or unique architectural styles applied on historic buildings in Walla Walla and includes examples of each to assist individuals with identifying architectural styles.

### 2.1. DEVELOPMENT PERIODS

The development periods are synthesized from the Downtown Walla Walla Historic District National Register of Historic Places nomination (2021), Downtown Walla Walla Intensive-Level Survey (2017), the Reconnaissance Built Environment Survey of Walla Walla's Germantown – Portions of Chase's Addition, Henderson's Addition, Freise Addition, and an Unplatted Area (2015), and Green's Park Additional Reconnaissance-Level Historic Survey (2013).

#### 2.1.1. Cayuse, Walla Walla, and Umatilla Peoples and Early Contact

The land now encompassing the city of Walla Walla has been home to the people of the Cayuse (*Weyiiletpu*), Umatilla (*Imatalamtláma*), and Walla Walla (*Walúulapam*) tribes since time immemorial.<sup>2</sup> Their ancestral lands stretch from the lowlands of the Columbia River to the highlands of the Blue Mountains in present-day southeastern Washington and northeastern Oregon. Prior to the arrival of Euro-American settler-colonists, the Cayuse, Umatilla, and Walla Walla people traveled on the Columbia Plateau, setting up seasonal camps to participate in annual cycles of hunting, fishing, trading, and celebration. Their winter villages were located along the Columbia and Snake rivers and their tributaries; they returned to the adjacent mountains during the spring, summer, and fall.<sup>3</sup> The region's natural resources supported the tribes as they gathered roots and berries, hunted elk and deer, and fished salmon. They also participated in a large network of trade with multiple tribes.

The Cayuse, Umatilla, and Walla Walla felt the impacts of non-indigenous colonialism on the continent by the mid-18th century as horses, disease, and trade goods affected the tribes.<sup>4</sup> However, the first

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2 These tribes are organized as the Confederated Tribes of the Umatilla Reservation. Jennifer Karson Engum, PhD, Cultural Resources Protection Program, *Traditional Use Study of Willamette Falls and the Lower Columbia River by the Confederate Tribes of the Umatilla Indian Reservation*, prepared for the CTUIR Board of Trustees, Fish and Wildlife Commission, Cultural Resources Committee (November 16, 2020), 2, [https://ctuir.org/media/55mobq1j/ctuir-traditional-use-study-of-willamette-falls-and-lower-willamette-river\\_nov-2020.pdf](https://ctuir.org/media/55mobq1j/ctuir-traditional-use-study-of-willamette-falls-and-lower-willamette-river_nov-2020.pdf).

3 Engum, *Traditional Use Study of Willamette Falls and the Lower Columbia River by the Confederate Tribes of the Umatilla Indian Reservation*, 3.

4 Ibid, 8.

"Military Post & City of Walla-Walla, W.T. in 1862. (1863)." Created by Gustave Sohon. Found in Report on the construction of a military road from Fort Walla-Walla to Fort Benton, 1863. UA963 .A5 1863 at Washington State University Libraries' Manuscripts, Archives, and Special Collections (MASC).



recorded contact with Euro-Americans occurred in 1805 as the Corps of Discovery, led by William Clark and Meriwether Lewis, noted the use of the Columbia River for travel for trade purposes. The Euro-American fur trade then extended into the Pacific Northwest in the following decades, impacting the tribes and their trade practices. Both the British Hudson's Bay Company and Canadian North West (Northwest) Company fur trade companies moved into the Northwest and clashed over control of the region.

### 2.1.2. Initial Trading and Settlement (1818–1858)

In 1818, the North West Company established a fort, called Fort Nez Percés (or Fort Nez Percé), at the confluence of the Walla Walla and Columbia Rivers. The Hudson's Bay Company (HBC) renamed it Fort Walla Walla in 1821. In the 1820s, French Canadian Métis<sup>5</sup> settled in the Walla Walla Valley. The Cayuse and Walla Walla directed them to where they could settle and allowed them to marry into local tribes.<sup>6</sup> Their settlement became known as Frenchtown, but it was scattered over 50 square miles and "simply a community of log cabins scattered among Indian camps."<sup>7</sup>

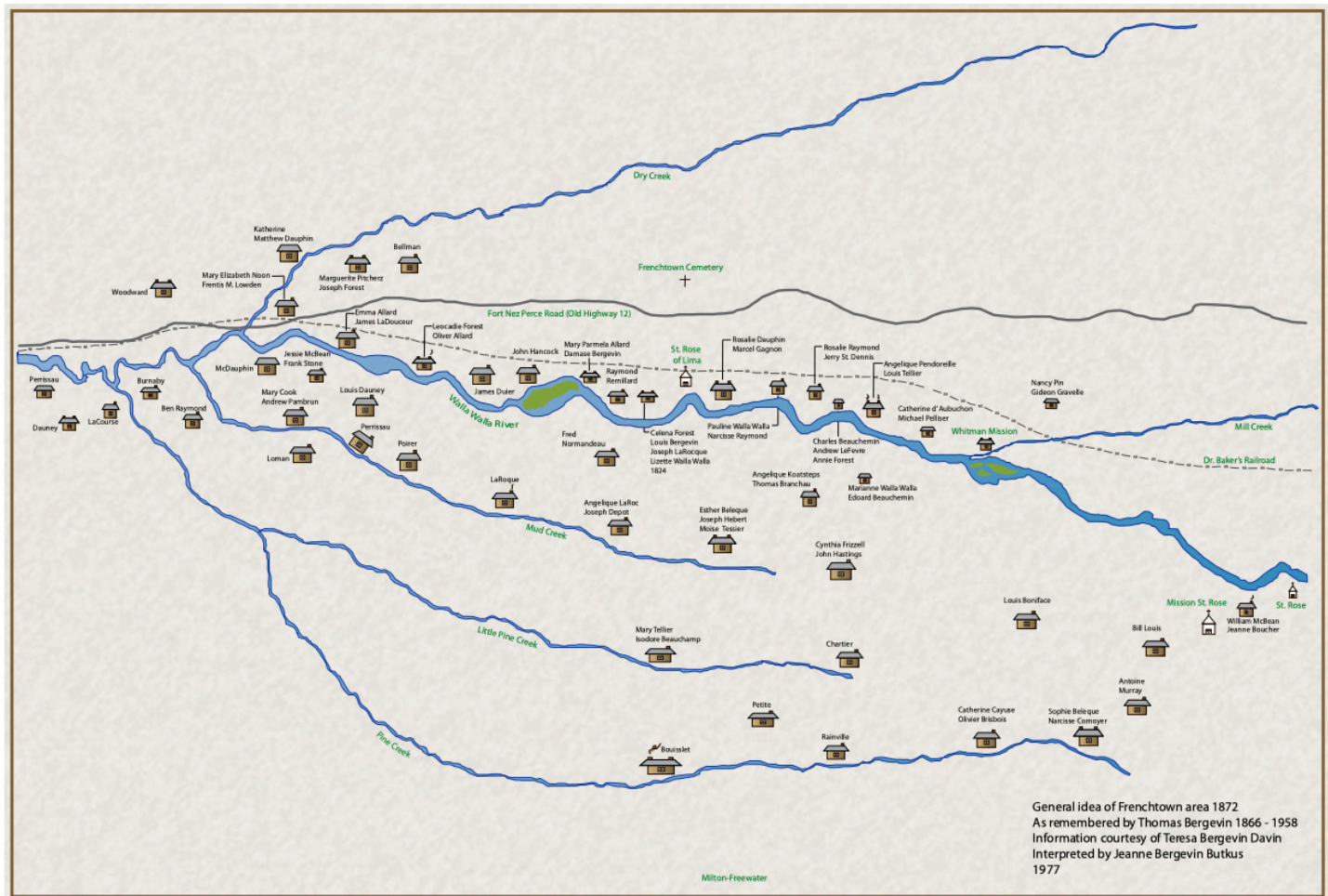
In the 1830s, white Christian missionaries followed the traders and explorers and sought to convert local tribes to Christianity. Presbyterian missionaries Marcus and Narcissa Whitman established a mission at Waiilatpu (west of present-day College Place) in October 1836, which became a key stop on the Oregon Trail as settler-colonists traveled westward. By the time the Whitmans arrived, there were over a dozen log cabins in the Frenchtown area near the mission. Tensions rose between the arriving Euro-Americans and the Cayuse, Umatilla, and Walla Walla tribes as the immigrants interfered with

5 According to Frenchtown Historical Site, "Métis peoples are those of mixed French and Native ancestry, often including other cultural origins as well, especially Scottish. The French word Métis, meaning mixed blood, came into common use in the 1800s on the Canadian prairies to describe the children of French-Canadian traders and indigenous women, mostly Cree and Ojibwa. These intermarriages established a new culture, including distinct languages (Mitchif or Métchif), as well as clothing, food, and music." Frenchtown Historical Site, The Métis, Frenchtown Historical Site, <http://www.frenchtownwa.org/the-metis/> (accessed March 22, 2022).

6 Sam Pambrun, "History of French Town," *Frenchtown* (2005), <http://www.frenchtownwa.org/frenchtown/> (accessed March 3, 2022).

7 Ibid.





A rendering of how Frenchtown was laid out in 1872, according to Thomas Bergevin (1866-1958). Courtesy Frenchtown Historic Site.

traditional tribal lifeways. Disease, likely carried by Euro-Americans, devastated the tribes, culminating in a measles epidemic in 1847.<sup>8</sup> The conflict escalated and in late November 1847, a band of Cayuse attacked the Whitman Mission, killing the Whitmans and 12 others. The Cayuse War followed in 1848 and continued through 1850. The conflict ended when five Cayuse turned themselves in for the Whitman Mission incident; the “Cayuse Five” were subsequently tried, convicted, and executed in 1850.

In the same year, Congress passed the Donation Land Claim Act of 1850 encouraging white settlement in the West. However, due to the conflict in the Walla Walla area, white settlement was limited for the next several years and the American Board of Commissioners ended its sponsorship of mission work in the region. Congress established the Washington Territory from a portion of Oregon Territory in 1853; Walla Walla County formed in April 1854. On May 29, 1855, representatives of the U.S. government met with tribal representatives *Niimiipuu* (Nez Perce), *Weyiiletpu*, *Walúulapam*, *Mámačatpam* (Yakama), and *Pelúucpuu* (Palouse). The outcome of the Treaty of 1855 for the Cayuse, Umatilla, and Walla Walla tribes was the establishment of a reservation, ceding 6.4 million acres for a 510,000-acre reservation on Cayuse homeland. The treaty was signed on June 9, 1855, but not ratified by Congress until March 8, 1859. After ratification, the Cayuse, Umatilla, and Walla Walla people were prevented

8 Engum, *Traditional Use Study of Willamette Falls and the Lower Columbia River by the Confederate Tribes of the Umatilla Indian Reservation*, 29.



Quarters 2 at Fort Walla Walla. Courtesy DAHP.



Restored Prince's Cabin, 2016. Courtesy Frenchtown Historic Site.

from continuing their traditional lifeways and were systematically relocated, sometimes by force, to the reservation.<sup>9</sup>

After the Treaty of 1855 was ratified, the U.S. government declared the ceded land open to American settlement, initiating the first wave of American settlement into the Walla Walla Valley. Fort Walla Walla was relocated in 1856 to a location southwest of the present-day city. Ransom Clark filed the first land claim in the valley in 1859 and built a cabin (which was documented by the Works Progress Administration through the Historic American Buildings Survey [HABS]).

Few buildings and structures remain from this era, but those within the city limits that are extant are associated with what was the third location of U.S. Army Fort Walla Walla. These include Quarters 2, 3, 4, and 5—completed in 1858 and constructed of adobe brick—which are contributing properties in the NRHP-listed Fort Walla Walla Historic District.<sup>10</sup> The “Prince’s cabin” at the Frenchtown historic site is outside the city limits but is believed to have been constructed ca. 1837 (and at the latest 1844, according to a mention of it in a letter written by Narcissa Whitman). It is an example of French-Canadian cabin design. Ransom Clark’s cabin was built in 1859 and is extant, although it has been moved to the Fort Walla Walla Museum site. **[INCLUDE PHOTO OF QUARTERS 2 AND PRINCE’S CABIN AS ILLUSTRATIONS]**

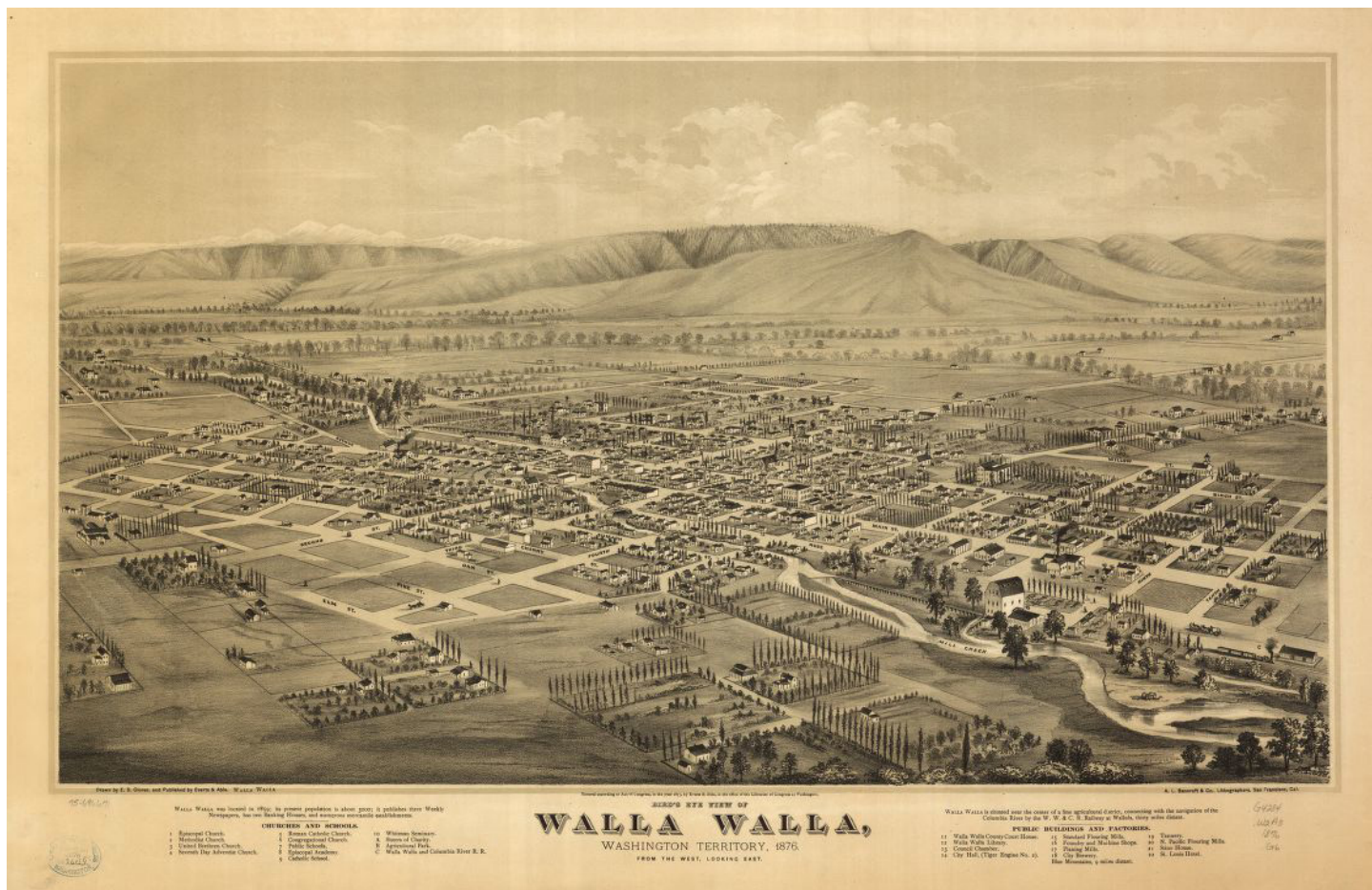
### 2.1.3. City Founding, Incorporation, and Early Construction (1859–1889)

Walla Walla County Commissioners asked county surveyor H. H. Chase to plat a city in 1859 at the developing townsite, initially called Steptoeville after Lt. Colonel E. J. Steptoe, commander of Fort Walla Walla. The town initially supported the nearby fort and area ranchers. The town’s population in 1860 reached over 700 and primarily consisted of white men, a mix of U.S. citizens and European

9 Ibid, 31.

10 Greg Hranac and Glen Lindeman, “Fort Walla Walla Historic District” (1974), National Register of Historic Places nomination, Section 7, Page 1.

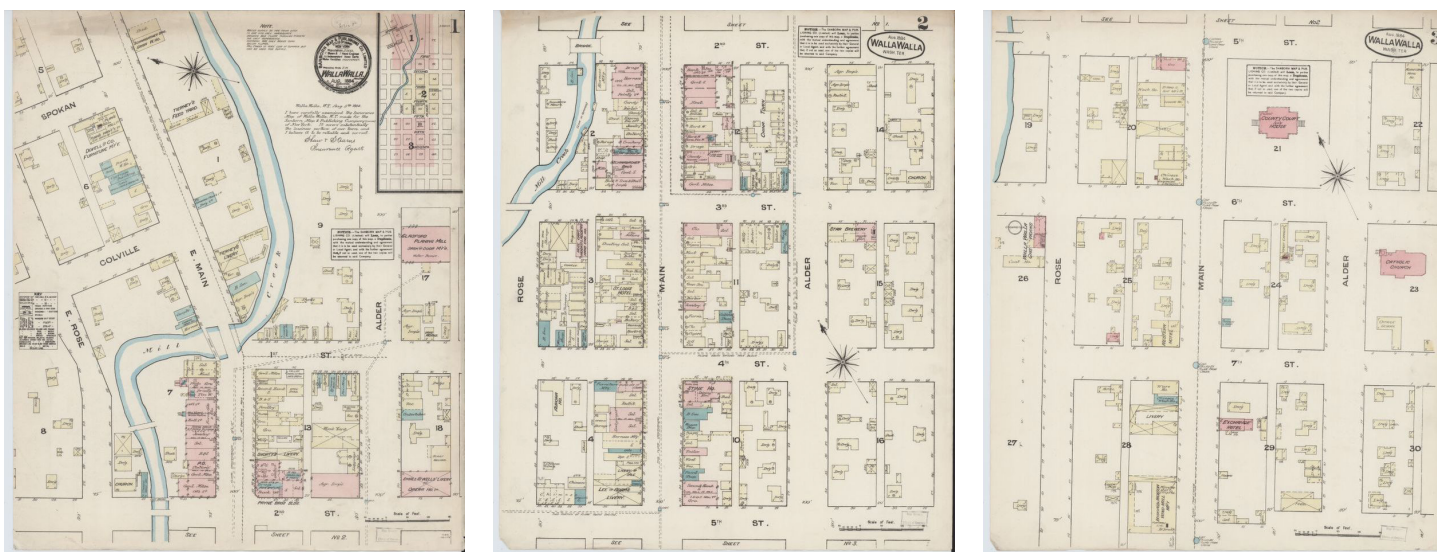




Bird's eye view of Walla Walla, Washington Territory. Walla Walla, Everts & Able 1876. Courtesy Library of Congress.

After the discovery of gold in 1861 in present-day Idaho, Walla Walla's growth was fast-tracked as it became a key supply stop for miners heading east. Area merchants, ranchers, and farmers flourished as a result. Many Chinese also arrived in the area, like others, seeking fortune and prosperity from the mines. Walla Walla was incorporated as a city in January 1862 and became the county seat. The number of commercial buildings constructed in Walla Walla quickly grew, doubling in the year following incorporation, many of them timber and constructed in the Western false-front form. Additional plats to the city filed in the 1860s extended the city's boundaries to the north and the southwest, with additions from the 1870s radiating out from the original townsite.<sup>12</sup> Residential construction supported the growing population. Houses were typically modest dwellings of wood box frame or balloon frame construction with simple details.<sup>13</sup> By 1870, the city's population had swelled to nearly 1,400 residents

12 Donovan and Associates, “Historic Survey Report: Green’s Park Addition Reconnaissance Level Historic Survey,” Appendix D-2, 58.



Sanborn Fire Insurance map sheets (1-3) from 1884. Courtesy Library of Congress.

and included more women, indicating Walla Walla's shift towards a more established community rather than simply a supply point.

As the boom of the gold rush faded, the farms and ranches supporting Walla Walla needed to expand the market for their goods. Dryland wheat farming had taken over the hills surrounding the city. Local business people, led by Dorsey Syng Baker, successfully financed construction of a rail line to connect Walla Walla with Wallula on the Columbia River to the west (at the original Fort Walla Walla site). Construction began in 1872 and the line reached Walla Walla in 1875. A second wave of Chinese immigrants arrived to construct the railroad, joining those who remained after the end of the gold rush. A fire swept through downtown Walla Walla in 1875, destroying the first wave of wood-frame construction.

By 1880, Walla Walla had grown to a population of 3,500—the largest city in Washington Territory.<sup>14</sup> In the same year, the city had between 600 and 800 Chinese residents, the largest Chinese community in eastern Washington.<sup>15</sup> Immigrants comprised a significant portion of Walla Walla's working class in the late 19th century, including the Chinese, Italians, and Volga German.<sup>16</sup> The Volga German immigrants were Germans from Russia that came to Walla Walla between 1880 and 1920. Eventually approximately 300 of these families settled in the southwestern portion of Walla Walla. They called their community *Russaecke* or *Russiche Ecke* (Russian Corner) but it was known in the larger community

14 Painter Preservation, "Walla Walla Downtown Historic District," National Register of Historic Places nomination (2021), Section 8, Pages 106-108.

15 Ashley M. Morton with James Knobbs and Kimberly Sutherland, "Cultural Resources Report: Cultural Resource Review Report for the City of Walla Walla Stormwater Quality and LID Retrofit Project," prepared for Anderson Perry & Associates Inc. (July 2014), 38-41. An early Chinese business owner in the city was Gee Hen Lee who operated a store called Hen Lee Company. Lee arrived in Walla Walla by 1861 and originally rented a log building from Dr. Dorsey Baker. Lee became the leader of the Chinese community in Walla Walla and sent for his wife from China. The Lees had five children—three sons and two daughters. Two of his children were Gee Shoo Lee (Shoo Fly) and Charley Ong (Charley Lee), who were born in the log cabin rented from Baker.

16 AHA!, "Reconnaissance Built Environment Survey of Walla Walla's Germantown—Portions of Chase's Addition, Henderson's Addition, Freise Addition and an Unplatted Area, Walla Walla, Washington" (August 2015), 8.



as Germantown. Germantown was roughly bounded by W Chestnut Street, S Second Avenue, Willard Street, and Chase Avenue.

Walla Walla was selected as the location for the territorial prison in 1886, later called the Washington State Penitentiary, on a site to the west of the city (the prison is currently within the city limits). This large employer drew more people to the area.<sup>17</sup> Architect George Babcock designed and supervised its construction.<sup>18</sup>

There were a number of publicly and privately funded schools established in the city by this time, including Whitman College in 1882 and Walla Walla College in 1892. Whitman College began as Whitman Seminary, a pre-collegiate academy for pioneer boys and girls established by Cushing Eells in 1852. Several churches had been founded with both Catholic and Protestant congregations.

According to the 1884 Sanborn Fire Insurance maps, Walla Walla's business district was centered along Rose, Main, and Alder streets and extended just beyond Seventh Avenue (formerly Seventh Street) to the west and beyond Colville Street to the east. The primary commercial core was along Main Street, between First and Fifth avenues, and featured primarily masonry construction with the occasional wood-frame building. More wood-frame dwellings were located north and south of the commercial core. The former county courthouse (demolished) stood at the west end of downtown and occupied the entire block bounded by W Main Street (north), S Sixth Avenue, W Alder Street, and S Seventh Avenue. By 1889, a new city hall and fire station stood at the southwest corner of W Rose Street and N Third Avenue.

The 1884 Sanborn map identified the area along the north side of W Alder Street between S Second and S Third avenues as "Chinatown" but also showed clusters of Chinese dwellings and businesses at the southeast corner of W Rose Street and N Fourth Avenue as well as the southeast corner of W Rose Street and N Fifth. A fire in 1887 burned much of this Chinatown. The Chinatown district then relocated to encompass the south side of W Rose Street, between N Third and N Fourth avenues, where there were already clusters of Chinese dwellings and businesses. The 1888 Sanborn maps then labeled this area as "Chinatown."

During this period, building designs by professional and self-taught architects emerged. Self-taught architect and carpenter Freeman P. Allen designed a Second Empire house for D. W. Small (314 E Poplar Street, ca. 1879, Small-Elliott House) as well as the city hall, county courthouse, and Baker School.<sup>19</sup> Other architects began to practice in the city during the 1880s, particularly after the trans-continental railroad connection arrived with the Northern Pacific Railroad in 1883. These architects included: John LeRomer (architect and builder) in 1880; E. W. Rhodes (architect and builder), O. T. Wegener (surveyor and architect), and A. Wickersham in partnership with Freeman P. Allen as Allen & Wickersham in 1881; and F. P. Allen with J. B. Whitmore as Allen & Whitmore, and George P. Thomp-

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17 AHA!, "Reconnaissance Built Environment Survey of Walla Walla's Germantown," 8.

18 Painter Preservation, "Walla Walla Downtown Historic District," Section 8, Page 120.

19 Donovan and Associates, "Historic Survey Report: Green's Park Addition," 13.

son with H. L. Joslin as Thompson & Joslin in 1883.<sup>20</sup> George W. Babcock was the only architect listed in the 1889 city directory.<sup>21</sup>

This period is reflected in Walla Walla's built environment in commercial, residential, educational, civic, and religious construction. Extant commercial buildings include a number of contributing buildings within the Walla Walla Downtown Historic District, such as the Brechtel Building (21 W Main Street, ca. 1869), Reynolds-Day Building (4-6 E Main Street, 1874), Stephens Block (5-7 E Main Street, 1876), the O'Donnell Hardware Building (22 W Main Street, 1876), Seil Building (10-16 E Main Street, 1886), H.E. Holmes Building (202-206 W Main Street, 1887), and the Max Baumeister Building (25-27 W Main Street, 1889). Extant residences from this period include the Sheets-Johnson House (392 Catherine Street, ca. 1873), Small-Elliott House (314 Poplar Street, ca. 1879), Kirkman House (214 N Colville Street, ca. 1880), and 704 Catherine Street (ca. 1885).



Lacey-Whitman Building (208-212 W Main, ca. 1879 ) on the left and H.E. Holmes Building (202-206 W Main Street, 1887) on the right, photographed in 1954 by Marion Dean Ross. Courtesy University of Oregon.

#### 2.1.4. City Beautiful and the Automobile (1890–1928)

This period covers a stage of significant growth for Walla Walla and the majority of its downtown construction projects. It also reflects substantial residential expansion, with increased construction in previously platted additions as well as the platting of 20 new additions. This period concludes with the construction of the 11-story Marcus Whitman Hotel, the last prominent building constructed in the downtown area before the Great Depression swept the nation.

The city's street railway system began in 1890 when the Walla Walla Street Railway and Investment Company began to run horse-drawn streetcars from Second Avenue and Main Street to Park Street. The system eventually encompassed six cars and four miles of track and operated until 1899.<sup>22</sup> During the final decade of the 19th century, additional large-scale buildings were constructed downtown, many of them designed in the Italianate style. These buildings included the Sayers Building (28 E Main Street, 1890), Whiteside Building (51-53 E Main Street, 1890), and the NRHP-listed Dacres Hotel (207 W Main Street, 1899).

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20 *Walla Walla City and County Directory, 1880* (Walla Walla: D. Allen Miller, 1880), 67; *Walla Walla City and County Directory, 1881* (Walla Walla: D. Allen Miller, 1881), 27, 91, 111, and 115; *Walla Walla City and County Directory, 1883* (Walla Walla: D. Allen Miller, 1883), 27, 34.

21 *Walla Walla City and County Directory, 1889* (Walla Walla: V. Amp. Smith, 1888), 68,

22 Richard Thompson, "Walla Walla Valley Railway," *Oregon Encyclopedia* (2018), [https://www.oregonencyclopedia.org/articles/walla\\_walla\\_valley\\_railway/#.YZWjRL3MK3J](https://www.oregonencyclopedia.org/articles/walla_walla_valley_railway/#.YZWjRL3MK3J) (accessed February 23, 2022).



Sharpstein School, photographed in 2018 by Carol M. Highsmith.  
Courtesy Library of Congress.

Residential platting between 1890 and 1899 included new additions as well as subdivisions of earlier plats. The new additions from this period were small in comparison to earlier additions and were primarily located around the southeast corner of the Original Townsite plate and northeast of Cain's 1865 Addition.<sup>23</sup> Styles of the Late Victorian era—Queen Anne, Stick, Shingle—began to gain popularity for residential construction over the previously utilized Italianate and Second Empire styles. More architects were listed in the city directories during this time, including William P. Clancy, Harold E. Crawford, R.B. Cox, Fredrick S. Starbard, Charles E. Finkenbinder and Henry Osterman, who became a well-known architect in the city. Osterman's residential designs included his own house at 508 Lincoln Street (1893) and the Philip Ritz House (1869 Plaza Way, 1895). A prominent school building was constructed, Sharpstein, in 1898 at 410 Howard Street.

The city continued to grow at the turn of the century, reaching over 10,000 people in 1900 and over 19,000 in 1910. Development in the city reflected the elements of the City Beautiful Movement, which promoted the beautification of cities with well-designed civic and urban centers with high-style architecture, and residential neighborhoods with open green spaces. The movement promoted order, harmony, and structure. The city paved many of its downtown streets between 1904 and 1905; other early 1900s civic improvements included the construction of the Keylor Grand Theater (203 W Alder Street, 1905, partially demolished, only former stage house remains), Walla Walla City Library/Carnegie Library (109 S Palouse Street, 1905), 43-acre Pioneer Park (a mile southeast of Second Avenue and Main Street, 1908), a new city hall (15 N Third Avenue, 1908), and the seven-story Baker Boyer Bank building (7 W Main Street, 1911).<sup>24</sup> Construction of a hydroelectric dam on the Walla Walla River in 1904 and the associated power plant in 1905 provided reliable and affordable electricity to the city.<sup>25</sup> In 1905, a new school, designed by architect Henry Osterman, was constructed in the Green's Park Addition. In 1910, Fort Walla Walla was closed as a military post; it was converted into a veterans hospital in 1921.

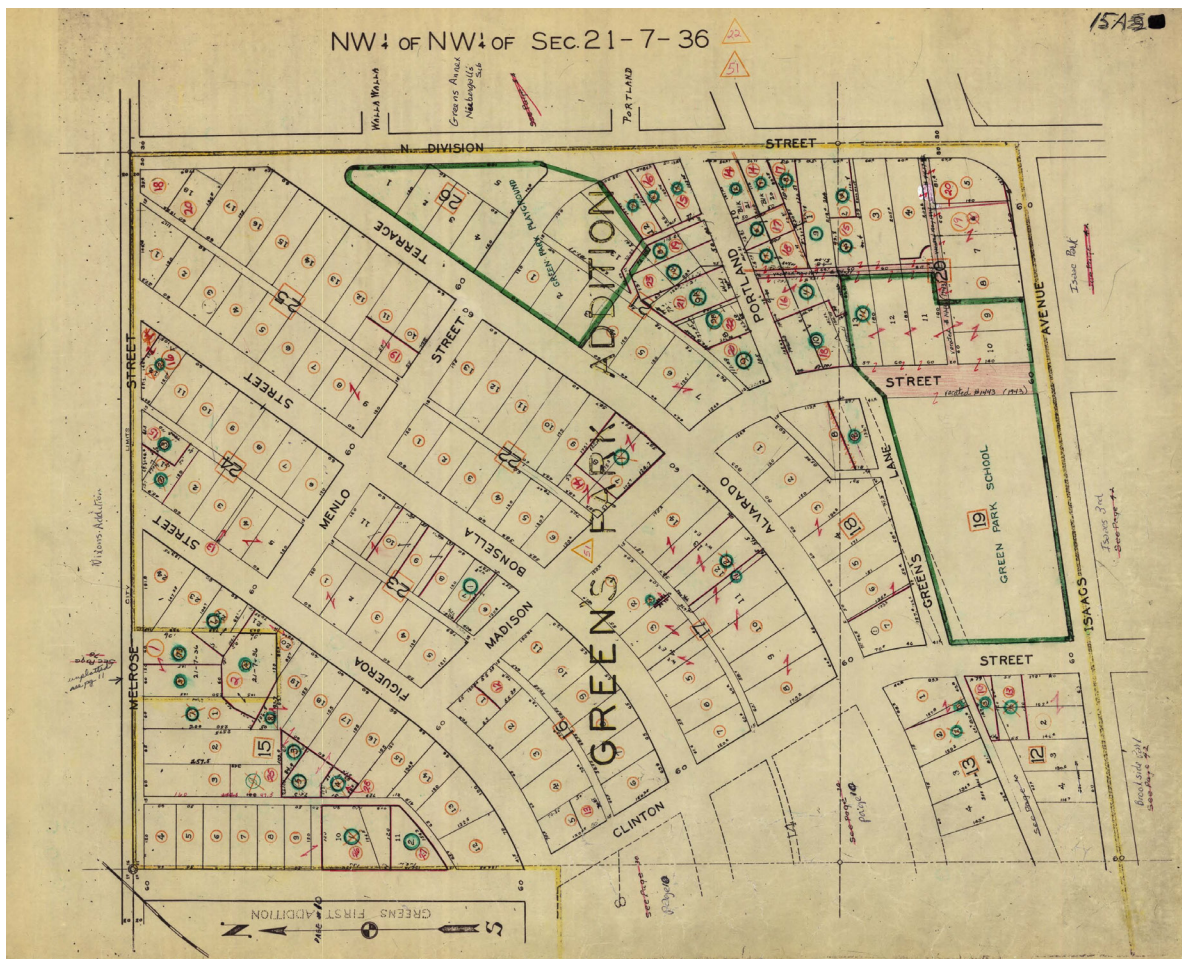
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23 Donovan and Associates, "Historic Survey Report: Green's Park Addition," 19-20. Between 1890 and 1899, the following additions were platted: Bardsley, Edgewood Place, Spring Grove #2, Jones, McAuliffs, Idlewilde, Hawleys, Walnut Grove, Singleton Subdivision, Abadies, Lasaters, Evans, Butler's, Stahl & Cambern, Jaycox, Chabot's 2nd, Isaacs 2nd, Boyd Grove, Council Grove, Palouse, and Weber. St. Pauls' School subdivided land between Palouse and Park streets south of Whitman Street. Council Crest in the heart of the city was subdivided and Butler's Addition, the largest of the additions, adjoined the prison property on the west and the O.R. & N. Depot on the south.

24 Michael J. Paulus, Jr., "Walla Walla—Thumbnail History," *Hstorylink.org The Free Online Encyclopedia of Washington State History* (February 26, 2008), <https://www.historylink.org/file/8486> (accessed March 15, 2022).

25 Painter Preservation, "Walla Walla Downtown Historic District," 108.





Green's Park Addition plat map, Courtesy Walla Walla County GIS Plat Book Index Map.

More than 60 additions were platted between 1900 and 1910, illustrating the city's population boom and need for additional housing. These additions ranged in size and configuration, but some followed the principles of the City Beautiful Movement and incorporated street trees, graded roads, curbs and sidewalks, and utilities into the developments. The Green's Park Addition, filed in 1903, was one such example. The neighborhood was platted by the Green family and managed by John Langdon of Green's Investment Company. The neighborhood had curvilinear, tree-lined streets and parking strips and included deed restrictions on minimum costs of initial structures on lots.<sup>26</sup>

There were numerous promoters of the city during this period, including the Walla Walla Woman's Reading Club and the Commercial Club (started in 1881 and formally organized in 1903). The reading club's efforts led to the construction of the Walla Walla City Library/ Carnegie Library (109 Palouse Street, 1905). The Commercial Club worked to promote population growth, heralding Walla Walla as the "Garden City." The prominence of the Commercial Club was reflected in the addition of a third floor to Henry Osterman-designed city hall—to house the Commercial Club.

The return of the streetcar to Walla Walla occurred during this period. The Walla Walla Valley Traction Company incorporated in 1905 to run an electric street railway system in the city connected with an interurban railroad to Oregon. Additional lines were opened in the following years, connecting the downtown area with the Prospect Heights and East Walla Walla neighborhoods.<sup>27</sup> City streetcar lines were discontinued by 1926 with interurban service ending in 1931.

26 Donovan and Associates, "Historic Survey Report: Green's Park Addition," 26-27.

27 Thompson, "Walla Walla Valley Railway."



Marcus Whitman Hotel, photographed in 2018 by Carol M. Highsmith. Courtesy Library of Congress.

The city's population fluctuated between 1910 and 1920, decreasing by nearly 20 percent. Although the arrival and expansion of the transcontinental railroad in the 1880s and 1890s helped establish Walla Walla as a regional center for agriculture, Spokane became the rail hub for the Inland Empire. The downtown core became gradually denser during this period, with over 60 buildings constructed downtown in the first three decades of the 20th century alone. Investors and property owners relied on local architects as well as architects from Seattle to design many of these new buildings, including the Beezer Brothers' designs for Baker Boyer Bank (1911), the A.M. Jenson Building (1919), and the First National Bank (1920); Henry Osterman's design of city hall (1908); and Sherwood D. Ford's design of the Marcus Whitman Hotel (1929). A new school, Paine School (now Lincoln High School), was constructed in 1927 at 421 S Fourth Avenue.

### 2.1.5. Great Depression and WWII (1929–1945)

This period covers Walla Walla's survival and development between the Great Depression and the end of World War II. The city's population had reached nearly 16,000 by 1930 and it continued to slowly grow during the depression and war years. During this period, the city survived a massive flood, economic hardships from the depression, and construction curtailment during the war years.

In the midst of the Great Depression, Walla Walla experienced a devastating three-day flood, the Mill Creek Flood of 1931, in the downtown area. The flood compromised the sewer system and damaged buildings, streets, and bridges. The U.S. Army Corps of Engineers (USACE) recommended improvements to Mill Creek in 1938. Improvements included the construction of trash barriers, a reservoir, a diversion structure, and channelization. The work was completed partially by the Works Progress Administration (WPA), one of President Roosevelt's New Deal programs, with the rest completed by a private contractor. The initial scope of work was completed in 1942 for \$1.5 million.

The price of wheat, Walla Walla County's cash crop, dropped significantly during the Great Depression and a Canadian tariff closed the region's primary market for their fresh fruits and vegetables.<sup>28</sup> However, the community's agriculture rebounded following the opening of an experimental cannery, Walla Walla Cannery Company, in 1932, which canned the fresh produce to expand marketability. The success of this cannery led to the establishment of others in the region.

Building construction slowed during this time, but a few key projects included the Congregational Church (73 S Palouse Street, 1931) and a Firestone Service Station (2 E Poplar Street, ca. 1930), along with new housing projects. Building permit activity increased during the mid-1930s as home-

28 Michael J. Paulus, Jr., "Walla Walla – Thumbnail History," *HistorLinkg.org Online Encyclopedia of Washington State History*, February 26, 2008, <https://www.historylink.org/file/8486> (accessed March 15, 2022).





View of Main Street after 1931 flood. Courtesy Washington State Archives.

buyers took advantage of New Deal programs to fuel residential construction, including the establishment of the Home Owners' Loan Corporation (HOLC) in 1933 and the National Housing Act of 1934, which created the Federal Housing Administration (FHA) that insured bank/home mortgages.

These New Deal programs increased homeownership and new

residential building, but the associated lending practices also created exclusionary practices often called red-lining. The HOLC created color-coded maps, or residential security maps, to demonstrate the “risk” associated with loans in particular neighborhoods. Higher risk levels corresponded with areas near noxious industrial operations or that had greater numbers of people of color and lower incomes. The FHA continued the practices established by the HOLC and, according to Richard Rothstein in his book, *The Color of Law*, “The FHA judged that properties would probably be too risky for insurance if they were in racially mixed neighborhoods or even in white neighborhoods near black ones that might possibly integrate in the future.”<sup>29</sup> These practices encouraged real estate agents, developers, and residents to write racially restrictive covenants to prevent their neighborhoods from being “redlined.”<sup>30</sup> The effects of redlining still impact areas throughout the country, including Walla Walla.

New residences constructed in Walla Walla were primarily small to medium in size, reflecting popular architectural styles like Minimal Traditional, Tudor Composite, and the WWII-Era Cottage. Many of these new houses were built east of N Clinton and north of Boyer Avenue. Local builders included William Huntington, Buell Throop, Chuck Mardis, Henry Gross, and O. D. Keen; local architects included Harold Emmons Crawford, Arnott Woodruffe, and Victor Siebert (a long time business partner with Henry Osterman). Duplexes and apartment building construction also increased during this period.<sup>31</sup> A few larger scale residences were completed in the late 1930s, mostly near Whitman College or in neighborhoods like Green's Park Addition.<sup>32</sup>

In the lead up to—as well as after—the United States' involvement in World War II, military presence expanded in Walla Walla. In addition to military installations nearby at Hermiston and Pendleton, Walla Walla was selected as a site for an airfield. The United States Army Corps of Engineers (USACE) built a bomber air-training base at the Walla Walla municipal airport in 1941 and runway work began in ear-

29 Rothstein, *The Color of Law*, 65.

30 Catherine Silva, “Racial Restrictive Covenants: Enforcing Neighborhood Segregation in Seattle,” *The Seattle Civil Rights & Labor History Project* (2009), [https://depts.washington.edu/civilr/covenants\\_report.htm](https://depts.washington.edu/civilr/covenants_report.htm) (accessed November 15, 2021).

31 Donovan and Associates, “Historic Survey Report: Green's Park Addition,” 32.

32 Ibid, 31.

ly 1942, with \$4 million allocated for the construction of new buildings.<sup>33</sup> The airfield brought troops in to the area for training and two United Service Organizations (USOs) were established in town for servicemen—one for white soldiers in the old Montgomery Ward store at 110-112 W Alder Street, and one for Black soldiers next to the Dacres Hotel at 205-209 W Main Street. In addition to the training base, McCaw General Army Hospital opened in 1943 with 1,850 beds. The hospital closed in February 1946. Housing construction practically halted in Walla Walla during the war years, with the exception of housing for service members and their families. These dwellings included duplexes, barracks, and other multi-family homes.<sup>34</sup>

### 2.1.6. Post-War Construction and Population Boom (1946–1970)

As World War II ended and veterans returned home—many returning to school, starting families, and buying homes—Walla Walla experienced a construction boom with commercial and residential projects picking up where they left off. Construction projects once again shifted to private development. The population also reached nearly 25,000 by the 1950 Census. Agriculture, particularly wheat farms, remained a dominant industry in the area, but there was an increasing shift to large, mechanized farms.

The USACE formed the Walla Walla District in 1948 as headquarters for their operations in Washington, Idaho, Oregon, and Wyoming, plus portions of Utah and Nevada. The headquarters moved into the former McCaw General Hospital building. The new district office supervised construction of nearby McNary Dam and continued the work to channelize Mill Creek, widening the channel and reinforcing it with concrete flumes in 1948.<sup>35</sup>

Downtown prospered early on in this period, with new businesses opening and many buildings receiving facade improvements, a modern contrast to the predominantly Italianate-style buildings. Among the better examples was the storefront of Green & Jackson Drugs (19 W Main Street), which was rebuilt with new display windows and modern materials. Other downtown buildings with mid-century façade renovations include Model Bakery (3 S 1st Avenue) and the Rees-Winans Block/Jones Building (6-10 N 2nd Avenue). Early post-war new construction included the Tire Service building (5 S Colville Street) ca. 1947. However, by the 1970s a shift away from downtown for new commercial activity emerged, particularly with the construction



Green & Jackson Drugs (19 W Main Street) after storefront remodel. Courtesy DAHP.

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33 Painter Preservation, “Walla Walla Downtown Historic District,” 112.

34 Donovan and Associates, “Historic Survey Report: Green’s Park Addition,” 33.

35 Artifacts Consulting, Inc., “Downtown Walla Walla Intensive-Level Survey” (August 2017), 26.





Pacific Power and Light in 2017. Photograph taken by Susan Johnson. Courtesy DAHP.

of the Eastgate Shopping Center in 1970 which reflected national suburbanization trends. However, well-designed downtown commercial construction during this period includes Pacific Power & Light Building (27 N 2nd Avenue) and the Walla Walla Federal Savings & Loan (16 S 2nd Avenue).

Between 1940 and 1950, Walla Walla's population grew by almost 6,000 residents, from approximately 18,000 to 24,000.<sup>36</sup> The population remained relatively stable through the 1960s and 1970s. This growth led to a significant increase in residential addition and subdivision platting and construction. New residential neighborhoods often featured curvilinear streets and cul-de-sacs and catered to the automobile.

These new subdivisions included: Milbrook

Park Addition, northeast of the City Park; Meadow View, south of downtown; and Crestview Addition, south of town and east of S Second Street.<sup>37</sup> Typically the houses of the 1940s and 1950s favored simple house designs with minimal detailing and that continued into the 1960s. Ranches and WWII-era cottages in the Minimal Traditional or Modern style were popular. The ranch form became the most popular form during this period and expanded in size from the compact ranches of the 1950s to the rambling ranches of the 1960s and beyond. Lots were typically wider than deep with driveways leading from attached garages to the street, reflecting new trends in residential design and construction. Suburban development was taken on by builders and developers in the post-war era as government financing made residential development more profitable. The speculative building process became widespread during this period with builders and developers constructing houses for anticipated, rather than existing, clients.

The city's economic and population gains were reflected in other construction in and around the city, including the expansion of medical facilities (e.g., the veteran's hospital) and educational construction, both K–12 and higher education institutions. Whitman College and Walla Walla College grew in the post-war period as returning veterans utilized the educational provisions of the G.I. Bill. A significant building campaign occurred on Whitman College's campus following approval of a campus plan in 1946, and new buildings included the Student Union Building, Penrose Memorial Library, Whitman Theater, Anderson Hall, Hall of Science, and Jewitt Hall. The city's public school facilities expanded during this period, with 1950s additions to Sharpstein Elementary and Green Park Elementary, plus the construction of four new school buildings: Garrison Middle School (906 Chase Avenue, 1950), Walla Walla High School (800 Abbott Road, 1964) Pioneer Middle School (430 Bridge Street, 1970), and Prospect Elementary (55 Reser Road, 1971). Architects during this phase included Henry Brandt Gessell, Gerald Mosman, and Theron Smith (Gessel-Smith-Mosman); and Vernon D. McFall. Builders included Henry Goss, L. D. Proctor, and Orlan Duette (O. D.) Keen.

36 Washington State Office of Financial Management, Forecasting Division, "Decennial Census Counts of Population for Cities and Towns," [https://ofm.wa.gov/sites/default/files/public/dataresearch/pop/april1/hseries/pop\\_decennial\\_census\\_series\\_1890-2010.xlsx](https://ofm.wa.gov/sites/default/files/public/dataresearch/pop/april1/hseries/pop_decennial_census_series_1890-2010.xlsx) (accessed March 21, 2022).

37 Donovan and Associates, "Historic Survey Report: Green's Park Addition," 36.

### 2.1.7. Winemaking and Revitalization (1971–present)

This period reflects the significant revitalization efforts in Walla Walla’s downtown core and the rise of viticulture (grape growing) as a prominent economic and tourism driver for the city. The city’s population had slightly declined by fewer than 1,000 residents by 1970, to 23,610, but then began a slow but steady upward trend for the next few decades. As of 2022, the population is approximately 32,000.

A period of urban renewal in the early 1970s resulted in the demolition of entire blocks downtown. According to the Downtown Walla Walla Historic District’s National Register nomination, these efforts resulted “in a number of historic building demolitions around the downtown core, including most of the pre-1888 two-story masonry buildings in the block east of the Delmonico Hotel along W Main between N Third and N Fourth streets that historically had linked W Main Street west to the county courthouse to downtown Walla Walla.”<sup>38</sup> A few investors pushed for investment in downtown Walla Walla and several new buildings were constructed downtown. These new modern buildings included Pacific Power & Light’s office building (1971) and a two-story, commercial office building (1976) primarily used by Fidelity Mutual Savings Bank.

The Walla Walla Main Street Foundation (now Downtown Walla Walla Foundation/DWFF) was formed in 1984 to help revitalize downtown. The award-winning program worked with banks to establish a low interest facade loan program (1987), created the “Walla Walla Redevelopment Plan” (1988), and supported building and streetscape improvements. The efforts of DWFF, investors, and Walla Walla citizens once again made the city’s downtown a commercial hub.

During this revitalization, grape growing and winemaking became a prominent industry in Walla Walla and the surrounding farmland by the mid-1980s. The wine industry has had a significant impact on reinvestment in Walla Walla’s downtown as it has become a destination for residents and tourists with shops, tasting rooms, and restaurants.

## 2.2. TYPES, FUNCTIONS, AND FORMS

Historic resource types consist of buildings, structures, objects, or sites, or they may be districts (i.e., groupings of buildings, structures, objects, or sites with a shared history). Functions convey the purpose for which the resource was designed and built, such as government, commerce, or education. The original use of a building usually, but does not always, match the function for which it was designed. Each function typically has distinguishing characteristics unique to its programming requirements, such as double-loaded corridors and small perimeter rooms for apartments, that help to visually convey the original use of the building. Building forms convey the composure of the building’s facade, roof form, and/or building footprint and are often influenced by function and architectural style.

This section is organized by historic functions associated with Walla Walla’s development. Where applicable, each is provided with forms commonly used for each function, such as different types of commercial buildings.

### 2.2.1. Agricultural

Agriculture remains a key industry in Walla Walla County, supporting the economy of the city. Agricultural landscapes and associated buildings remain outside the city limits, but there may still be extant buildings and structures in areas more recently annexed.

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38 Painter Preservation, “Walla Walla Downtown Historic District,” Section 8, Pages 115-116.



### 2.2.2. Commercial

Commercial buildings in Walla Walla include office buildings, banks, stores (department and specialty), and restaurants. The oldest commercial district in Walla Walla is centered around Main Street and First and Second avenues. The earliest commercial forms in the city were primarily wood-frame, one- to two-story structures, designed as Western False Front buildings. As the town grew and an 1875 fire destroyed the first wave of permanent construction, new buildings were developed. These structures were typically one- and two-part commercial blocks. One-part blocks are typically one story and feature a storefront assembly (bulkhead, storefront windows, transom) and a parapet wall. Examples include: Fouts Auto Repair & Machine Shop (209 E Alder Street, 1921) and the Stewart and Barnett Building (214 E Alder Street, ca. 1902).



Stewart and Barnett Building, photographed by Diana Painter. Courtesy DAHP.

Two-part blocks are typically two to four stories tall, with the building's facade divided into two distinct zones and separated by a belt course. Historically, the ground floor consisted of public space for commercial tenants, while the upper floors were private spaces for offices, meeting halls, or even living quarters. These are the predominant building form in the core of downtown Walla Walla. Many were designed in the Italianate style. Examples of two-part block commercial buildings in Walla Walla include the Pratt Building (109 E Main Street, 1928) and the H. H. Hungate Building (214-226 E Main Street, 1905).



Pratt Building in 2008. Courtesy DAHP.

In the post-war period, commercial architecture largely abandoned the forms of the early 20th century. These new buildings were typically freestanding (rather than one part of a larger streetscape), lacked a primary facade, and placed significant value on parking and catering to the automobile. Examples include First Federal Savings & Loan (10 S First Avenue, 1965) and Walla Walla Federal Savings & Loan (16 S Second Avenue, 1967).

An extremely common form for commercial buildings emerged in the mid-20th century—strip commercial. These buildings are typically one story with a horizontal emphasis. There are no standard architectural styles associated with this form, but they all are designed to accommodate an increasing reliance on automobiles. They either feature pull-in parking in front of the building or are set within parking lots. Strip malls and shopping centers were constructed further away from the city's downtown core and reflect the city's suburbanization.



First Federal Savings & Loan. Courtesy DAHP.



### 2.2.3. Educational

Educational buildings in Walla Walla include public schools as well as libraries and buildings associated with the higher education institutions located within the city. These buildings range in architectural style and form, reflecting prevailing trends in educational design. The oldest extant school building in Walla Walla is the 1898 Sharpstein School at 410 Howard Street. The two-story building has a raised foundation, rusticated ground floor, and centered four-story bell tower. The Romanesque Revival building was named after local lawyer and territorial legislator B. L. Sharpstein and continues to operate as a school. Other high style school buildings in the city are the 1901 Washington School (517 Cayuse Street, now apartments), 1905 Green Park Elementary School (1105 E Isaacs Avenue), and 1925 Lincoln High School (421 S 4th Avenue). The majority of the city's schools were constructed in the post-war era to educate the city's growing population. These include Garrison Middle School (906 Chase Avenue, 1950), Walla Walla High School (800 Abbott Road, 1964) Pioneer Middle School (430 Bridge Street, 1970), and Prospect Point Elementary (55 Reser Road, 1971).



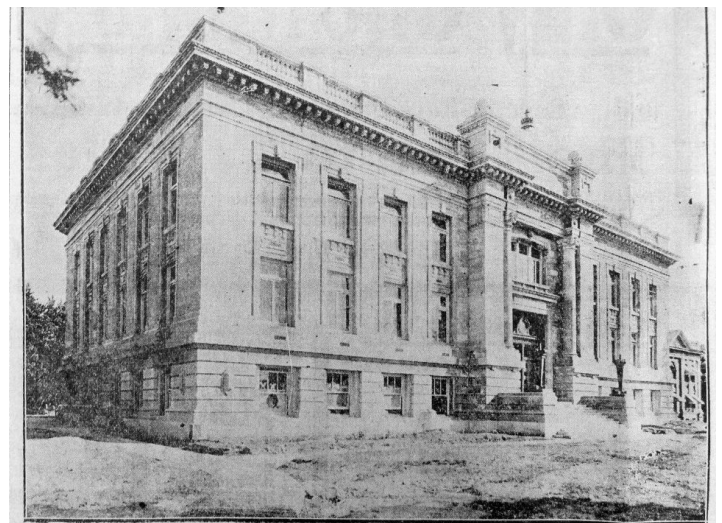
Lincoln High School. Courtesy DAHP.



Walla Walla High School. Courtesy DAHP.

### 2.2.4. Government

Walla Walla has several historic government buildings, reflecting local, county, and federal government. These include city hall and the county courthouse, as well as the post office and various government office buildings. These buildings are masonry in material, reflecting their importance and prominence within the community. They are typically architect-designed and feature a high level of architectural ornamentation, further highlighting their important status in the city. However, the level of detail present is typically associated with the time period when they were constructed. Seats of government and authority, like the courts or city hall, are typically large substantial buildings that are two or more stories tall. Key government buildings in Walla Walla include: the Walla Walla county courthouse (315 W Main Street, 1916), city hall (15 N 3rd Avenue, 1908), and the Walla Walla post office (128 N 2nd Avenue, 1914). The court-



Walla Walla county courthouse. Courtesy DAHP.



house and city hall were both designed by Henry Osterman. The channelization and flood control elements associated with Mill Creek provide an example of public works resources.

Non-historic government buildings also exist within the city and may become historic when they reach 50 years of age, such as Fire Station No. 1. (200 S 12th Avenue, 1980).

### 2.2.5. Recreational

Recreational buildings, structures, and sites include theaters, auditoriums, museums, and parks. Many of Walla Walla's historic recreational buildings have been demolished or have been repurposed. For example, the Liberty Theater building (54 E Main Street, 1917) and Pedigo-Loney Building (9-19 N Second Avenue, 1909) were both originally constructed as motion picture theaters but no longer operate as theaters. The Walla Walla County fairgrounds are located within the city limits, but are under Walla Walla County's jurisdiction. The fair's history dates back to 1866 and the oldest extant structure on the grounds, the pavilion, was completed in 1906 as a fruit exhibit and concert hall. The Walla Walla Fair Pavilion (363 Orchard Street, 1907) is listed to the WHR. Volunteer Park at the northwest corner of E Alder Street and S Palouse Street was established as a public park in 1904.



Liberty Theater in 2018 by Carol M. Highsmith. Courtesy Library of Congress.

### 2.2.6. Religious

There are a number of historic churches in Walla Walla. They reflect a range of architectural styles, but typically have a steeple that readily identifies them as religious buildings. Early churches constructed in the city were typically wood-frame buildings, while larger, more substantial church buildings followed in the early 20th century. The oldest extant church buildings in Walla Walla include the German Evangelical/Christ Lutheran Church (140 W Maple Street, 1904), which originally served the Volga German



German Evangelical/Christ Lutheran Church. Courtesy DAHP.



First Presbyterian Church, Postcard. Courtesy DAHP.



settlers, and Central Christian Church (66 S Palouse Street, 1906). Larger, high style church buildings were constructed to house growing congregations or to replace damaged buildings. These include the First Congregational Church (73 S Palouse Street, 1922) and First Presbyterian Church (325 S First Avenue, 1914).

### 2.2.7. Residential (Domestic)

The earliest dwellings in the city were wood-frame structures near the emerging business district; they were typically one to one-and-a-half stories high with gabled roofs. Another early housing form in Walla Walla was the single room occupancy (SRO) hotel, which provided lodging on the upper floors of downtown buildings. An extant SRO building in Walla Walla is the Delmonico Hotel (202-212 W Main Street, ca. 1879).

However, the dominant residential building type in Walla Walla is the single-family residence. These are predominantly wood-frame construction; there are brick houses and apartment buildings, but those are likely wood frame with brick veneer. Common housing forms include bungalows, American foursquares, and workingman's foursquares. Residential construction radiated from the city center and, as the city grew in the late 19th century, houses became more stylized reflecting the arrival of architects as well as mail-order design books. Single-family residences within the city feature a range of architectural styles. As the automobile became more popular, residential design began to accommodate them, incorporating wider streets and driveways, alleys, and garages. Several examples of workingman's foursquares—one story houses with a square footprint and hipped roofs—are present along W Maple Street in the Germantown area and include 218 W Maple Street (ca. 1900). An American Foursquare example is 605 Catherine Street (ca. 1903).

Post-World War II development occurred further away from the city center and typically featured curvilinear streets, larger parcels, and modern forms (e.g., ranch houses and split levels) reflecting changing trends in residential planning. Examples include the houses at 1204 Portland Avenue (ca. 1946), 924 Bonnie Brae Street (ca. 1959), and 824 Figueroa Street (ca. 1963).

Duplexes and apartment buildings also became more prevalent after the turn of the century, particularly in the 1920s and beyond. 1032-1034 Alvarado Terrace is an example of a duplex while 1020-



218 W Maple Street. Courtesy DAHP.



924 Bonnie Brae Street. Courtesy DAHP.





Clinton Court Apartments in 2018 by Carol M. Highsmith. Courtesy Library of Congress.

1026 Alvarado Terrace is an example of a bungalow court apartment complex. The 5-story Clinton Court Apartments (1923) at 602 Boyer Avenue are a well-executed example of a mid-rise apartment block, a common multi-family building type that emerged with the population and construction boom of the 1920s. Other multi-family properties present in Walla Walla include purpose-built sorority and fraternity houses for Whitman College. These are typically two or more stories with high style architecture. Examples include the Sigma Chi House (1005 E Isaacs Avenue, 1938) and the Phi Delta Theta House (715 Estrella Avenue, ca. 1915).

### 2.2.8. Social

Social buildings include meeting halls (e.g., fraternal or union halls), clubhouses (e.g., literary societies), and civic buildings (e.g., volunteer or public service organizations). There are a number of historic social buildings in Walla Walla. Many of the oldest organizations in the city had architect-designed buildings constructed to house and promote their group. Extant historic examples include the Masonic Temple (129-131 E Alder Street, 1905) and the YMCA (28 S Spokane Street, 1907).



Masonic Temple. Courtesy DAHP.

### 2.2.9. Transportation

Transportation-related built environment in Walla Walla includes bridges, extant railroad lines, depots, roadways, highways, the airport and related buildings and fields, and even pedestrian trails. Key transportation historic buildings and structures may include aircraft hangers at the Walla Walla Regional Airport (formerly the Walla Walla Airfield and then Walla Walla Army Airbase).

## 2.3. ARCHITECTURAL STYLES

There are several architectural styles exhibited throughout Walla Walla; the following section provides a brief overview of the most common and a couple of extant examples of each style. It also includes a time frame within which the trend occurred. While the styles discussed are presented in roughly chronological order, many architectural styles overlap in time periods. The architectural descriptions are largely summarized from Virginia McAlester's *A Field Guide to American Architecture*, DAHP's architectural style webpages, and previous survey documentation. This is not an exhaustive list of architectural styles present in Walla Walla, but relies primarily on identified styles in previous survey documentation.



Kirkman Residence. Courtesy DAHP.

### 2.3.1. Italianate

The Italianate style was popular between the 1870s and 1890s in Walla Walla. The style was a reaction against the formalism of classical architectural language and drew its inspiration from 16th century Italian villas adapted to American homes and commercial buildings. Key features of the style include arched windows with elaborate window and door surrounds, bracketed cornices (often in pairs), and ornate quoins and cornices. Towers, cupolas, or lanterns were common on residential examples. Brick and wood are common materials. Residential examples of Italianate architecture include the brick Kirkman Residence (214 N Colville Street, ca. 1880) and the Falconer House (704 Catherine Street, ca. 1886). Commercial examples include the Paine Building (2 E Main Street, 1879) and Reynolds-Day Building (4-6 E Main Street, 1874).



Single Officer's Quarters, Fort Walla Walla. Courtesy DAHP.

### 2.3.2. Second Empire

The Second Empire style was imported from France and is marked by a unique roof form—the mansard. The mansard roof is a four-sided, double slope gambrel roof and in the Second Empire style would have windows added to create additional living space in the attic. The style was popular in the U.S. from the 1850s through the 1880s with most examples in Washington dating from the late 1880s. Second Empire buildings in the Pacific Northwest are usually wood, but may be brick, and are embellished with stone or simulated stone. Windows are typically paired with decorative hoods. Bay windows are a typical feature of these buildings.<sup>39</sup> The Small-Elliott House (314 Poplar Street, ca. 1879) was originally a Second Empire house but has been enlarged and no longer looks like that style. Other examples are Quarters 48 and 49 at Fort Walla Walla (77 Wainwright Drive, 1888).

39 Washington State Department of Archaeology and Historic Preservation, "Second Empire: 1870-1890," *Washington State Department of Archaeology and Historic Preservation*, <https://dahp.wa.gov/historic-preservation/historic-buildings/architectural-style-guide/second-empire> (accessed March 21, 2022).



### 2.3.3. Queen Anne

Queen Anne architecture is known for its use of ornamentation and its complex and asymmetrical rooflines and facades. Queen Anne residences might have a mix of materials or application of materials, such as horizontal boards (clapboards) with shingles used as an accent in simple or decorative courses. Most Queen Anne houses are two- to two-and-a-half-stories tall, but some small one-story cottages do exist. Though the style is known for its elaborate decoration, over the years the ornamentation decreased, resulting in a simpler subset of Queen Anne residence styles known as the Free Classic. Free Classic houses also feature small classical details, like a column or pediments with the proportions of Queen Anne residences. Queen Anne and Free Classic examples date from the city founding, incorporation, and early construction and the early years of the City Beautiful and the automobile development periods. Folk Victorian architecture is related to the Queen Anne style and typically applied to residential buildings. These houses are typically smaller than the Queen Anne houses and are one or one-and-a-half-stories. They may have a few Queen Anne ornamental details but are generally more subdued than the high style and ornate Queen Anne houses. Queen Anne examples include the Philip Ritz house (1869 Plaza Way, 1895), Norman Francis Butler House (207 E Cherry Street, 1882), and the Free Classic house at 325 E Alder Street (ca. 1900).



Norman Francis Butler House. Courtesy DAHP.



325 E Alder Street. Courtesy Google Streetview.

### 2.3.4. Richardsonian Romanesque

The Richardsonian Romanesque style is named after architect Henry Hobson Richardson. The style is marked by the semicircular arch—used at windows, doors, and even cornices. Heavy, rock-faced stone (often at the ground floor and on trim details), round arches, square towers, contrasting colors, and compound arches are key elements of the style.<sup>40</sup> Richardsonian Romanesque examples are the Die Brucke Building (38 E Main Street, 1903) and Memorial Building (1900) at Whitman College.



Memorial Hall. in 2018 by Carol M. Highsmith. Courtesy Library of Congress.

40 History Colorado, "Romanesque Revival—Richardsonian Romanesque," *History Colorado*, <https://www.history-colorado.org/romanesque-revival-richardsonian-romanesque> (accessed March 24, 2022).



### 2.3.5. Beaux Arts

The Beaux Arts style is named for the French school of architecture, Ecole des Beaux-Arts. The style gained popularity after the 1893 Columbian Exposition in Chicago. Beaux Arts buildings are formal and monumental with elaborate ornamentation; the style was often used on public buildings as well as large mansions. Key characteristics of the style are symmetry, classical Greek and Roman elements (e.g., columns, pediments, balustrades), quoins, porches, balconies, and opulent details like swags and garlands. Examples include: YMCA (28 S Spokane Street, 1907), Baker Boyer National Bank (8 S Second Avenue, 1911), and A. M. Jensen Building (54 E Main Street, 1919).



Baker Boyer National Bank. Courtesy DAHP.

### 2.3.6. Craftsman

The Craftsman architectural style emerged from the Arts and Crafts movement in the early 20<sup>th</sup> century. The Craftsman style, popularly used on American residences, is identified by low pitched roofs, porches with tapered or squared piers, exposed or decorative structural members, broad overhanging eaves, and asymmetrical facades. Wood is the predominant cladding material on Craftsman houses, but brick or river rock may be present at chimneys or porch supports. They are typically one to one-and-a-half stories—the ubiquitous Craftsman bungalow—but larger, high style examples are not uncommon. Craftsman detailing often extended to the detached garages that may have been constructed to accompany the main dwelling, reflecting the increasing popularity of automobiles. Craftsman houses in Walla Walla date from the City Beautiful and the Automobile (1890–1928) development period. Good examples of Craftsman houses include the Ruiz, Soto House (234 W Maple Street, 1914), Baldwin House (629 Chase Avenue, ca. 1925), and 623 E Alder Street (ca. 1910).



Ruiz, Soto House. Courtesy DAHP.

### 2.3.7. Colonial Revival

Colonial Revival takes its inspiration from the architecture constructed by English colonists during the 17<sup>th</sup> century. Colonial Revival applies to a number of building types, but it was particularly popular for residential construction. Common characteristics of Colonial Revival houses are symmetrical main facades, classical cornices, highlighted entries (sidelights, transoms, pediments, large porches or porticos), and double-hung windows (these may have shutters). There are subtypes within Colonial Revival, including Dutch Colonial Revival (distinguished by gambrel roofs) and Spanish Colonial



Baldwin House. Courtesy DAHP.





143 W Maple Street. Courtesy DAHP.



1141 Alvarado Terrace. Courtesy DAHP.

Revival. There are also Colonial Revival bungalows that feature the style's elements as applied to one-story bungalows. Colonial Revival buildings in Walla Walla primarily date from the City Beautiful and the automobile (1890–1928) and Great Depression and WWII (1929–1945) development periods, but some examples may exist in the early post-war years. A Colonial Revival bungalow example is the Thomas House (143 W Maple Street, ca. 1905). Larger Colonial Revival examples are 516 S Palouse Street (1922) and 1141 Alvarado Terrace (1917). A Dutch Colonial Revival example is 341 E Alder Street (ca. 1920).

### 2.3.8. Tudor Revival

The Tudor Revival style is based on the architecture of the 16<sup>th</sup> century Tudor period of English history. Architectural historian Virginia McAlester notes in *A Field Guide to American Houses* that these examples really only resemble that period in their use of ornamental, false half-timbering. Tudor Revival resembles idealized versions of medieval architecture with cross gables, elliptical arches, arched panels, and half-timbering. Smaller versions of Tudor Revival rarely use half-timbering but may have jerkinheads (clipped gables) and are more modest in size and ornamentation. Tudor Revival buildings date from the later years of the City Beautiful and the automobile (1890–1928) development with more modest versions from the Great Depression and WWII (1929–1945) period. Examples include the Smith House at (922 Bonsella Street, 1909), 561 Boyer (ca. 1918), and the Pal Clark House at 33 N Clinton Street (1927).



922 Bonsella Street. Courtesy DAHP.



### 2.3.9. Minimal Traditional

The Minimal Traditional style is a transitional one, bridging the period and stylistic differences between the popular period revivals of the 1920s and the modernism of the 1950s and 1960s. Minimal Traditional, most typically applied to single family residences, became popular during the Great Depression years and continued into the 1940s. Minimal Traditional houses have simplified architectural elements and a compact form; they are typically one story with close eaves, small front porches or a stoop, and often a front-facing gable and large chimney. Two-story examples do exist, but are far less common. Minimal Traditional houses in Walla Walla primarily date from the Great Depression and WWII (1929–1945) period. A larger Minimal Traditional house example is 1001 Penrose Street (1946) with a smaller one next door at 937 Penrose Street (1946).



1001 Penrose Street. Courtesy Google Streetview.

### 2.3.10. International Style

The International Style was popular in the mid-1930s until the 1960s and influenced the subsequent Contemporary style. International style buildings often feature flat roofs, cubic massing, smooth exterior surfaces, minimal or simple detailing, horizontal bands of windows, and asymmetrical projections.<sup>41</sup> The exterior cladding was typically smooth, likely poured concrete, tile, stucco, or plywood painted in one color to emphasize a clean aesthetic.<sup>42</sup> The Jones Building (6 N 2<sup>nd</sup> Avenue) was renovated in 1951 to have an International Style appearance. The commercial building at 1067 E Isaacs (1939) is a small-scale example of the style. Residential examples include the house at 216 N Madison Street (1937) and 949 Boyer Avenue (1936).



216 N Madison Street. Courtesy DAHP.

41 BOLA Architecture + Planning, "Mid-Century King County: A Context Statement on Post-War Residential Development," (August 2017), prepared for the King County Preservation Program, 6.

42 Michael Houser, "Mid-Century Modern Architecture in Washington State," *Department of Archaeology and Historic Preservation* (March 2016), <https://dahp.wa.gov/sites/default/files/MidCenturyWorkshop%20reduced.pdf> (accessed April 28, 2022).



### 2.3.11. Contemporary

Contemporary is the term typically used for post-war era modern, high-style residential construction and was popular during the 1950s and 1960s. Contemporary buildings may have low-pitch or flat roofs with broad enclosed overhangs likely with exposed supporting beams and structural supports.<sup>43</sup> There can be a mix of cladding materials on these buildings, including wood, stone or simulated stone, or brick veneer. The house at 405 N Madison Street (1956) and 1816 Center Street (1955) are examples of Contemporary ranch houses.



405 N Madison Street. Courtesy DAHP.

### 2.3.12. Brutalism

Brutalism emerged in popularity in the 1960s and is identified by its massiveness, sculptural appearance, and use of concrete (often board-formed). It is most typically used on civic and educational buildings. Seattle First National Bank (1980) at 111 W Main Street is an example of Brutalism.



Seattle First National Bank. Courtesy DAHP.

### 2.3.13. Googie/Populuxe

The Googie and Populuxe styles are essentially the same or very similar styles, with Populuxe typically applied to residential construction and Googie to commercial. These styles emerged in the post-World War II era as new technologies allowed for the mass production of sculptural metal and plastic. The styles are futuristic and reflective of the space age of the 1960s. Exaggeration, dramatic angles, plastic, steel, neon, canted windows are hallmarks of the styles. Coyle Oldsmobile (1976) at 103 E Poplar Street is an example of Googie architecture with its canted windows.



Coyle Oldsmobile. Courtesy DAHP.

### 2.3.14. New Formalism

New Formalism was an architectural style that was popular in the 1960s and 1970s. It was often used on banks, institutional, and civic buildings. New Formalist buildings were often monumental and emphasized symmetry, but reflected contemporary materials and building techniques (e.g., umbrella shells, waffle slabs, and folded plates). These buildings apply “the formal geometries

<sup>43</sup> Northwest Vernacular, Inc., and SJM Cultural Resource Services, “Surrey Downs Reconnaissance Level Survey,” prepared for Main Street Apartments LLC (August 2021), 37.



Cascade Natural Gas. Courtesy DAHP.

of classicism in new forms, materials, and decorative expressions.”<sup>44</sup> New Formalist examples are Walla Walla High School (1963) at 800 Abbott Road, designed by Kenneth Brooks; Cascade Natural Gas (1966) at 324 W Rose Street, designed by Theron E. Smith; and Cordiner Hall (1968) at Whitman College, designed by Naramore, Bain, Brady, and Johanson (NBBJ).

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44 Painter Preservation and helveticka, “Spokane Mid-20th Century Architectural Survey Report: City of Spokane Mid-20th Century Modern Context Statement and Inventory,” (2017), prepared for Spokane Historic Preservation Office, 24.

### 3. Current Status of Historic Preservation

The following chapter outlines the status of historic preservation policy in the City of Walla Walla at various levels.

Walla Walla has a robust historic preservation program that has built upon the work of the Downtown Walla Walla Foundation within the downtown commercial core. The city maintains dedicated staff to support the Commission and SEPA compliance. The Commission has approved designations for 39 resources to date for listing to the WWRHP. There are 24 individually listed NRHP listed resources and two NRHP historic districts within the city limits. Survey work to-date has focused on the downtown commercial core that led to the NRHP Walla Walla Downtown Historic District designation and two neighborhood surveys of Green's Park Addition and Germantown.

The protection of and inadvertent discovery process for archaeological resources remains as both a threat to these cultural resources and an opportunity for working closely with the CUITR to improve processes. Survey work throughout the city remains an opportunity for continued work as most of the city and its parks have not been surveyed, in particular mid-20<sup>th</sup> century resources, and to work with and build on research completed by Walla Walla 2020. Underutilized and non-retrofitted unreinforced masonry buildings remain both a threat and an opportunity to build on and update URM survey data and to build on guidance on returning vacant upper floors to use prepared by the Downtown Walla Walla Foundation.

The following sections address applicable federal and state preservation and environmental laws; an overview of the City of Walla Walla's historic preservation ordinance and program; a description of survey and inventory work completed within the city to date; the various historic registers; a summary of how the City currently integrates historic preservation; and a breakdown of financial incentives and related programs that can support historic preservation.

Based on this review, NWV developed recommendations to enhance the city's historic preservation program and provide action items to progress the program forward. These recommendations can be found in chapter 5.

#### 3.1. PRESERVATION LAWS

The following section outlines overarching federal and state laws that establish the structure for the city's preservation program, requirements for projects with federal involvement or projects that trigger environmental impact review, and the consideration of historic preservation as part of the city's comprehensive plan.

##### 3.1.1. Federal

Federal preservation laws establish the responsibility for stewardship of our nation's cultural and architectural heritage and provide the legal framework that supports the state and local implementation of this stewardship. These are applicable to Walla Walla where projects have a federal nexus, such as funding, permitting or licensing. These key applicable federal laws affect historic preservation (note this is not a comprehensive list):

- **The National Historic Preservation Act (NHPA) of 1966** (80 Stat. 915, 16 U.S.C. 470 et seq.) built on two earlier measures to support historic preservation: the Antiquities Act of 1906 and the Historic Sites Act of 1935. The NHPA created the President's Advisory Council on Historic Preservation, the National Register of Historic Places (NRHP), and the National Historic Landmarks



Program. The NHPA also ordered that the U.S. Secretary of the Interior develop and issue Standards for the Treatment of Historic Properties and, under Section 106, required the identification and evaluation of impacts to historic resources as part of federal undertakings to avoid, minimize, or mitigate potential adverse effects. Federal undertakings are projects with federal funding, permitting, or licensing.

The NHPA also delegated responsibility to states and federally recognized Indian tribes to establish a historic preservation office and conduct identification, evaluation, and nomination work. Tribal Historic Preservation Officers (THPO) are officially designated to direct a program on tribal lands.

At the city level, the Certified Local Government (CLG) program is one way the state historic preservation offices (SHPO) conduct this important work. Communities that have committed to historic preservation can become CLGs through establishing a preservation ordinance and creating a historic preservation commission. CLG communities can receive technical assistance and grants—there are 87 CLG communities in Washington. NPS certified Walla Walla as a CLG in 2003.

- **The U.S. Department of Transportation Act of 1966** (as amended) gathered 31 different federal offices into a single Cabinet-level department. Section 4(f) of the act prohibits the Federal Highway Administration and other U.S. Department of Transportation agencies from “using land from publicly owned parks, recreation areas (including recreational trails), wildlife and waterfowl refuges, or public and private historic properties, unless there is no feasible and prudent alternative to that use and the action includes all possible planning to minimize harm to the property resulting from such a use.” (23 CFR Part 774).
- **The National Environmental Policy Act (NEPA) of 1969** (83 Stat. 852, 42 U.S.C. 4321 et seq.) provides a framework for evaluating the environmental impact of federally assisted projects via the preparation of an Environmental Impact Statement (EIS).
- **The Archaeological Resource Protection Act (ARPA) of 1979** (16 U.S.C. 470aa–470mm; Public Law 96–95 and amendments to it) provides for “the protection of archaeological resources and sites which are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals” (Sec. 2(4)(b)).
- **The Native American Graves Protection and Repatriation Act (NAGPRA)** of 1990 outlines the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations related to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and cultural items. Any local government or institution receiving federal funds must comply with NAGPRA. State and local laws regulate excavations and discoveries, but NAGPRA may apply depending on who controls human remains or cultural items removed from private or state lands as a holding or collection.

### 3.1.2. State

State preservation laws support the statewide coordination and implementation of historic preservation and enable delegation of responsibilities to cities to manage and implement historic preservation at the local level, and when state permits are required or state funds utilized in projects. The Department of Archaeology and Historic Preservation (DAHP) is the Washington State Historic Preservation Office (SHPO) and the primary state agency with knowledge and expertise in historic preservation. These are the key applicable statutes affecting historic preservation, but they are not a comprehensive list:



**The State Environmental Policy Act (SEPA) of 1971** (RCW 43.21C, statute; WAC 197-11 WAC, rules) modeled after NEPA, ensures that environmental values are considered during decision-making. SEPA utilizes a systematic and interdisciplinary approach to identify likely environmental impacts from projects—which can range from private to public facility construction—and decisions, such as adopting comprehensive plans and zoning. The intent of SEPA is to reduce likely impacts, provide for public involvement in decisions, and—when adverse environmental impacts are identified—can result in conditional approvals and or denial of a proposal. “Question 13” on the SEPA checklist addresses cultural resources (built environment and archaeological).

**The Shoreline Management Act (SMA) of 1971** (RCW 90.58) provides a mechanism for protecting cultural and natural resources along the state’s shorelines (rivers, lakes, coastal waters) through management and evaluation. Walla Walla’s only shoreline body of water is Mill Creek.<sup>45</sup>

**The Governor’s Executive Order 21-02** (GEO 21-02, formerly 05-05) sets forth the requirement that potential impacts to cultural resources be considered through consultation with DAHP and tribal governments as part of any state funded project or investment. This applies to all agencies receiving funding through the capital budget and is applicable to these agencies when they are distributing those funds to City projects. The applicable state agencies are responsible for initiating consultation with DAHP and affected tribes.

**The Abandoned and Historic Cemeteries and Historic Graves** (RCW 68.60) establishes the mechanism for DAHP to grant to a local entity, such as a city or non-profit, the authority to maintain and protect an abandoned cemetery and limits their liability.

**The Washington State Historic Building Code** (RCW 19.27.120) provides building officials with latitude to utilize alternative methods for building code compliance that are less invasive to an unreinforced masonry building or a Washington Heritage Register- (WHR) or NRHP-listed structure, while still reducing the hazard of the existing building. It requires the state building code council to adopt rules to provide alternative methods.

**The Archaeological Sites and Resources Act** (RCW 27.53) empowers DAHP with the authority to issue civil penalties to enforce permits issued under RCW 27.53.060, the ability to consider previous penalties when issuing permits, and provides guidance to state, county, and city governments when approving archaeological work on public lands based on the public benefit importance of retaining and protecting archaeological resources.

**The Archaeological Excavation and Removal Permit** (WAC 25-48) sets forth the process requirements, including review procedures needed for a permit to be issued for archaeological excavation and removal. It establishes civil penalties if the process requirements are not followed.

## 3.2. LOCAL PRESERVATION PROGRAM

The City of Walla Walla adopted its historic preservation ordinance, ordinance number 2002-26 on October 23, 2002. It was codified within the Walla Walla Municipal Code (WWMC) as Chapter 2.27 Historic Preservation Commission under Title 2, Administration and also known per WWMC 2.27.020 as the “Historic Preservation Ordinance of the City of Walla Walla.” The historic preservation ordinance was updated on December 4, 2019, through ordinance number 2019-38.

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<sup>45</sup> City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, SMP-5. The portions of Mill Creek within the city are part of the U.S. Army Corps of Engineers Mill Creek Flood Control Project, which provides a federal nexus involving the consideration of Section 106 of the NHPA.

The city officially became a certified local government (CLG) in 2003 pursuant to the general requirements of the National Historic Preservation Act Amendments of 1980 (16 U.S.C. 470 et seq., P.L. 96-515). As a CLG, the city is responsible for maintaining the historic preservation commission (Commission); continuing to survey local historic properties; maintaining the Walla Walla Register of Historic Places (WWRHP); design review and certificate of appropriateness issuing for changes to WWRHP-listed resources; enforcing state or local preservation laws; reviewing NRHP nominations; and providing the public with opportunities to participate in historic preservation activities. Details about the WWRHP are provided under 3.4 Historic Registers.

All references to the WWMC utilize the *title.chapter.section(subsection)* numerical format.

### 3.2.1. Commission and Ordinance

The Commission and ordinance are essential to support the city and the public in planning and decision-making around historic preservation.

Per WWMC 2.37.010 the purpose of the City's historic preservation ordinance:

*“is to provide for the identification, evaluation, designation, and protection of designated historic and prehistoric resources within the boundaries of the city of Walla Walla and to preserve and rehabilitate eligible historic properties within the city for future generations through special valuation, a property tax incentive, as provided in Chapter [84.26](#) of the Revised Code of Washington (RCW), and other means, in order to:*

*A. Safeguard the heritage of Walla Walla as represented by those buildings, districts, objects, sites, and structures which reflect significant elements of Walla Walla history;*

*B. Foster civic and neighborhood pride in the beauty and accomplishments of the past, and a sense of identity based on Walla Walla history;*

*C. Stabilize or improve the aesthetic and economic vitality and values of such sites, improvements, and objects;*

*D. Assist, encourage, and provide incentives to private owners for preservation, restoration, redevelopment and use of outstanding historic buildings, districts, objects, sites, and structures;*

*E. Promote and facilitate the early identification and resolution of conflicts between preservation of historic resources and alternative land uses; and*

*F. Conserve valuable material and energy resources by ongoing use and maintenance of the existing built environment. (Ord. 2019-38 § 1 (part), 2019: Ord. 2002-26 § 1, 2002).”*

The operation of the commission is guided by WWMC 2.27.040 and the Bylaws of the Commission, adopted and revised through August 22, 2019.

### 3.3. SURVEY AND INVENTORY

There are multiple inventories within the city that relate to historic resources and are maintained by different entities and accessed in different ways. Note that registers are different than inventories and are addressed in section 3.4 Historic Registers. These inventories are addressed in the following sections, including how to access each, and include the City of Walla Walla historic inventory, the NPS inventory of properties with HABS/HAER/HALS recordation, the City tree inventory; the City parks, trails, and markers inventory; DAHP's archaeological resources inventory; DAHP's cemetery inventory; and the State Department of Commerce URM survey inventory. The Commission is responsible for maintaining and updating only the City of Walla Walla historic inventory.

#### 3.3.1. City of Walla Walla Historic Inventory

An inventory of historic resources is an essential tool for cities to collect, in a single location, data on individual resources (sites, objects, buildings, and structures) within the city to inform planning, decision-making, and interpretation.

Conducting surveys of historic resources is identified in WWMC 2.27.040(D)(1) as a power, duty, and responsibility of the Commission. Data collected through surveys undertaken by and within the city as part of developing and updating the city inventory are recorded in WISAARD, which is the permanent statewide inventory of architectural and archaeological records data maintained by DAHP. Annual CLG grant funding is available from the NPS through DAHP to support ongoing survey work.

DAHP publishes standards, *Washington State Standards for Cultural Resource Reporting*, to help communities and historic preservation professionals identify, evaluate, and document historic resources in the state.

Cultural resource surveys conducted within the city limits resulted in over 1,300 inventoried in the City of Walla Walla historic inventory via WISAARD (including three linear resources and 244 resources derived from the 2011 assessor data upload project). The three linear resources on the inventory document the Mill Creek Flood Channel. The bulk of the resources stem from multiple cultural resource surveys (both built environment and archaeology) conducted within or overlapping the city limits, including over 110 surveys conducted within the last 20 years.

The following table lists key built environment surveys addressing buildings across large areas of the city.

*A **survey** is the process of collecting and recording information on historic resources. There are two types of surveys: reconnaissance-level survey (RLS) and intensive-level survey (ILS).*

*An **inventory** is the organized compilation of the survey records.*

*A **reconnaissance-level survey (RLS)**, is used to identify, document, and report basic data for historic resources. An RLS is the first step in documenting properties and provides local governments and DAHP with a baseline dataset about individual and potential historic district eligibility within a surveyed area. Information collected for an RLS is primarily limited to physical and architectural data. General research is conducted to provide context for the survey area; individual property research is not necessary with an RLS.*

*An **intensive-level survey (ILS)** is often the next step after an RLS and contains a higher level of documentation for each surveyed property. This documentation includes additional research into the history of each individual survey property, such as builders, architects, and previous owners and tenants. This survey is often used as the next step towards a potential individual or historic district National Register nomination.*



**Table 1. Key Built Environment Surveys**

NADB #	SURVEY NAME	AUTHOR	YEAR
1680073	Reconnaissance-Level Historic Property Survey of Downtown Walla Walla	Jill Dowling, MHP	2008
1684394	Green's Park Addition Reconnaissance-Level Historic Survey (including a citywide Residential Historic Context)	Donovan and Associates	2013
1687369	Reconnaissance Built Environment Survey of Walla Walla's Germantown: Portions of Chase's Addition, Henderson's Addition, Freise Addition, and an Unplatted Area, Walla Walla, Washington (Germantown RLS)	Architectural History & Archaeology! LLC	2015
1689638	Downtown Walla Walla Intensive-Level Survey	Artifacts Consulting, Inc.	2017

### 3.3.2. HABS/HAER/HALS Inventory

In 1937, Historic American Buildings Survey (HABS) documentation was undertaken for the Ransom Clark Cabin.<sup>46</sup> Subsequent and Historic American Engineering Record (HAER) level documentation was completed for the Division Street Bridge in 2005 and the Lowden-Gardena Road Bridge in 2008.

The HABS, HAER, and Historic American Landscapes Survey (HALS) programs are administered by the National Park Service and constitute the nation's largest archive of historic architectural, engineering, and landscape documentation. These records can be accessed through the Library of Congress. [URL for link: <https://www.loc.gov/pictures/collection/hh/>] For HABS/HAER level documentation recorded in WISAARD but not submitted to the Library of Congress, these records can be accessed through WISSARD with "Walla Walla" in the search field and then going to HABS and HAER in the categories.

### 3.3.3. Tree Inventory

The purpose of a tree inventory is to support management of the city's trees within the public realm, including care and priorities, planting, and budgeting to support a healthy urban forest. Trees within the public realm consist generally of street, site, and park trees. Site (relating to public building landscapes) trees are addressed in association with the related building, and park trees are addressed below, under 3.3.d. Parks. Street and park tree management is guided by the *Urban Forest Management Plan* (2021). The city's Parks and Recreation Department and the Parks, Recreation and Urban Forestry Advisory Board administer the tree inventory.

The city's Parks Department maintains an inventory of over 7,400 street trees; over 4,400 park trees; and one historic tree (northern red oak planted ca. 1940; Tree ID TI14-1262). Based on historic USGS aerials dating to 1952, street trees existed as part of the streetscape; however, the role and extent of early planning involved in species and genus selection and tree placement from at least the late 1800s

46 HABS ID No. 39, HABS WASH 36-WAL.V,1.

to the present is not documented. This inventory is accessible through the City's website. [URL: <https://www.wallawallawa.gov/government/parks-and-recreation/street-trees>]

Trees within both the public and private realm are subject to Chapter 12.50, Heritage Trees of the WWMC, which, “has three purposes: (1) to identify heritage trees on public and private property; (2) to inform private property heritage tree owners about the treasures they possess; and (3) to encourage maintenance and protection of all heritage trees.”

The city maintains an inventory of Champion and Heritage trees. Subsection 12.50.020(F) defines a heritage tree as “a tree or group of trees designated by the city because they meet the criteria of exceptional value. Exceptional value is determined by the urban forestry advisory commission based on association with historic figures or events, rare or unusual species, exceptional aesthetic quality, or large size.” Champion trees are generally some of the largest examples of their species, with the American Forest Association providing point categories for details including circumference, height, and crown spread. There are three heritage, seven heritage and champion, and 38 champion-trees within the city. Many of these trees are included in *A Walking Guide to the Big Trees of Walla Walla*, edited by Gayle F. Bodorff and Thomas Mair (now in its third edition, 2020). Walking tours within this guide cover Whitman College, Pioneer Park, and the North and South loops.

### 3.3.4. Parks, Trails, and Markers

There are 19 parks within city limits that are managed by the City of Walla Walla Parks and Recreation Department. Parks, which include sports fields, trails, cemeteries, and golf courses, form an important part of the city's built and cultural landscape heritage. These are accessible on the City's website. [URL: <https://www.wallawallawa.gov/government/parks-and-recreation/parks>] The 2018 *Walla Walla Parks and Recreation Comprehensive Plan* provides an inventory of and guidance on parks stewardship.

The Carnegie building at 109 S Palouse Street is operated by the city as a community facility and is listed to the NRHP and WHR but is not in the WWRHP. The 2004 *Fort Walla Walla Park Master Plan* guides stewardship of Fort Walla Walla Park; a substantial portion resides within the NRHP- and WHR-listed Fort Walla Walla Historic District.

Survey work relative to historic preservation has occurred only at Menlo Park and Pioneer Park. Menlo Park was surveyed as part of the 2013 *Green's Park Addition RLS*.<sup>47</sup> Pioneer Park has had a Historic Property Inventory (HPI) form prepared for the park (Property ID 713176) and the fountain (Property ID 720597) as part of the City of Walla Walla Pioneer Park Fountain Renovation project (DAHP No. 2019-11-08828). None of the HPI forms provide a detailed understanding of the City's parks. No survey work has been recorded for other parks 50 years or older within the city.

Pedestrian and bicycle paths and trails provide an opportunity for public education and interpretation relative to historic resources, particularly where these align with historic circulation patterns or pass-through spaces or by buildings that are historically significant. The city participated with stakeholders in the region to develop the Blue Mountain Region Trails Plan with support from the NPS Rivers, Trails and Conservation Assistance program.<sup>48</sup> Trails within the city include the Mill Creek Trail and the High-

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47 Donovan, Sally, “Green Park Playground,” Historic Property Inventory Form, 2013, Department of Archaeology and Historic Preservation, <https://wisaard.dahp.wa.gov/Resource/617407/PropertyInventory/1559470>, accessed 2/18/2022.

48 Blue Mountain Region Trails. 2019. URL: <https://www.bluezonetrails.org/about-us.html>, accessed 2/18/2022.

way 12 Trail. Historic circulation rights-of-way can also provide a basis for establishing new trails within the city to support both recreation and historic preservation. The Blue Mountain Region Trails Plan provides recommendations on path, sidewalk, and bike lane improvements within the city, including a bike lane along Poplar Street linking downtown with Fort Walla Walla. There are at least six Daughters of the American Revolution markers installed over 50 years ago within the city.

Walking tours include the walking tour and trail guide brochures developed by the Walla Walla Chamber of Commerce for Fort Walla Walla, Downtown Walla Walla, Walla Walla Historic Homes, and Boyer Avenue, as well as “A Walking Guide to the Big Trees of Walla Walla.” Heritage markers and interpretive plaques within the city were generated predominately by the Walla Walla 2020 Historic Sites and Markers project and the Historic Research Reports and Building Plaques Program. The sites and markers project seeks to “honor unmarked Walla Walla area historic sites, most of which are unknown to the general public [...]”.<sup>49</sup>

The following table lists the city’s parks and major trails, and estimated year established as a park.

**Table 2. City Parks and Trails**

NAME	LOCATION	YEAR ESTABLISHED
Borleske Stadium	Rees Avenue and E Pine Street	1926
Carnegie	109 S Palouse Street	1905 built
Eastgate Lions Park	Wilbur Street and Tacoma Street	1965
Fort Walla Walla Park	Dalles Military Road and Myra Road	1961
Highway 12 Trail	Highway 12	1960s
Heritage Square Park	Between Spokane Street and Colville Street on Main Street	1992
Howard Tietan Park	Howard Street and Tietan Street	1968
Jefferson Park	S Ninth Avenue and Malcolm Street	1931
Memorial Pool and Park	Rees Avenue and E Pine Street	1939
Menlo Park	Division Street and Portland Street	1939
Mill Creek Sportsplex	Tausick Way and Garrison Street	2002
Mill Creek Trail	Mill Creek between Rooks Park and Eastgate Lions Park	2000s
Mountain View Cemetery	S Second Avenue	1860s
Pioneer Park	Alder Street and Division Street	1901
Valley Little League Baseball Fields	Wilbur Street and Tacoma Street	1963
Veterans Memorial Golf Course	Rees Avenue and Par 72 Drive	1946
Vista Terrace Park	Mountain Park Drive	1976
Volunteer Park	Alder Street and Palouse Street	1904
Washington Park	Ninth Avenue and Cherry Street	1927
Wildwood Park	Division Street and Boyer Avenue	1924
Xeriscape Park	Rose Street and Isaacs Avenue	2017

49 Walla Walla 2020. 2022. “Historic Sites & Markers Project,” and “Historic Research Reports & Building Plaques Program,” URL: <https://ww2020.net/historic-sites/>, accessed 2/24/2022.



### 3.3.5. Archaeological Resources

DAHP maintains the inventory of archaeological sites and traditional cultural properties (TCPs) identified within the state in WISAARD. This information is confidential and not accessible to non-archaeologists due to the potential risk to these resources. Ground-disturbing activities have the potential to inadvertently damage these resources and, as such, are important to consider in the overall context of historic preservation and cultural resources.

The City of Walla Walla is within the traditional cultural and historical boundaries of the Colville Tribe, Nez Perce Tribe, Confederated Tribes of the Umatilla Indian Reservation, and the Yakama Nation.

The Confederated Tribes of the Umatilla Indian Reservation developed their Cultural Resources Protection Program in 1987 and in 1996 officially assumed Tribal Historic Preservation Officer (THPO) responsibilities for tribal lands.<sup>50</sup>

Section 106 of the National Historic Preservation Act provides a mechanism for identification and consideration of potential impacts to archaeological resources and THPO and DAHP consultation; however, this only applies to projects undertaken by a federal agency, using federal funds, or requiring a federal license or permit (collectively these are referred to as a federal nexus).

At the City level, SEPA provides a mechanism for review of municipal and private projects for the identification and consideration of potential impacts to archaeological resources and THPO and DAHP consultation. Question 13 on the SEPA checklist addresses cultural resources (built environment and archaeological). The city website does not have an example of an inadvertent discovery plan (IDP), and an IDP would only be required if the project having ground disturbance triggers SEPA review (not a categorical exemption under WWMC 20.14.081), and the necessity is identified through that review.

### 3.3.6. Cemeteries

Cemeteries within the city, in addition to being the final resting place of the community's ancestors, can be direct links to tell the stories of under-represented communities, to provide important genealogical information, and can yield information on the city's cultural heritage. The City's Parks and Recreation Department manages one of the cemeteries in the city, Mountain View Cemetery.

The Walla Walla Historic Cemeteries organization is an active participant in the protection and maintenance of historic cemeteries county-wide and actively leads tours of historic cemeteries. The group received official "Certificates for the Care and Maintenance" from DAHP for permission to care for two cemeteries outside of the city limits per RCW 68.60.030.

### 3.3.7. URM Survey

The 2018 *Washington Unreinforced Masonry Building Inventory* undertaken by the Department of Commerce identified 137 known and suspected Unreinforced Masonry buildings (URMs) within the city as part of a state-wide effort to identify and share information with stakeholders. This data is accessible through the Department of Commerce. [URL <https://www.commerce.wa.gov/programs/research-services/unreinforced-masonry-building-inventory/>] The data set does not include information

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50 Confederated Tribes of the Umatilla Indian Reservation. 2020. "Cultural Resources Protection," URL: <https://www.ctuir.org/departments/natural-resources/cultural-resources-protection/>, accessed 2/8/2022.

on historic status (whether buildings are listed or eligible), vacancy and underutilization, and minimal to no data on Building and Site Characteristics.<sup>51</sup>

The city is classified as a seismic zone D0 under the adopted International Building Code.<sup>52</sup> Chapter 12, “Jurisdiction Specific Hazard Mitigation City of Walla Walla” in the *Walla Walla County Multi-Jurisdictional Hazard Mitigation Plan* (HMP), revised in 2020, identifies the risk rating for earthquakes as high, with a medium probability and a high vulnerability.<sup>53</sup>

The HMP identifies the following mitigation strategies affecting historic resources within the city. The HMP does not include language addressing mitigation strategies for commercial or residential buildings within the city.

WW-7 recommends a structural assessment and improvements to City Hall. This building is classified as a historic contributing resource within the NRHP-listed Downtown Walla Walla historic district.

WW-8 recommends a structural assessment and improvements to city public parking infrastructure nearby and overlaying Mill Creek diversion canal under the City. This work potentially occurs within the NRHP-listed Downtown Walla Walla Historic District.

### 3.4. HISTORIC REGISTERS

A historic register is an official list of districts, sites, buildings, structures, and objects significant in history, architecture, archaeology, engineering, and culture. Properties can be listed or designated in multiple registers. Each register has different review and regulatory requirements, and these are addressed under each register in the following sections. For example, NRHP properties are listed by the Keeper of the Register to the National Register of Historic Places, but WWRHP properties are designated by the Commission to the City of Walla Walla Register of Historic Places.

Historic registers are important planning and public education tools. They document properties that form Walla Walla’s built environment heritage with their architectural integrity and significant architectural and historical associations, and for which there is public benefit in their preservation.

Registers utilize the term “property” rather than “resource” utilized in inventories. This stems in part from the legal boundary established as part of designation or listing. Under WVMC 2.27.030(M), “historic property” is defined as “real property together with improvements thereon, except property listed in a register primarily for objects buried below ground, which is listed in a local register of a certified local government or the National Register of Historic Places.” Historic resources designated or listed to a register become part of a historic property that encompasses the historic resource and associated land within the designation or listing boundary.

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51 Washington URM Dashboard, 2020. URL: <https://fortress.wa.gov/com/urmasonry/urmaso-nary/#15/46.0688/-118.3461/>, accessed 2/18/2022.

52 Northwest Management, Inc. 2018, rev. 2020. *Walla Walla County Multi-Jurisdictional Hazard Mitigation Plan* (HMP), prepared for the Walla Walla County Emergency Management Department, 118.

53 Northwest Management, Inc. 2018, rev. 2020. *Walla Walla County Multi-Jurisdictional Hazard Mitigation Plan* (HMP), prepared for the Walla Walla County Emergency Management Department, 114.

### 3.4.1. City of Walla Walla Register

Properties designated to the City of Walla Walla Register of Historic Places (WWRHP) are subject to design review, typically for exterior alterations, by the Commission, protection from demolition, and eligible incentives, including but not limited to the State Special Valuation program a property tax reduction incentive. Properties can be designated either individually or as part of a historic district. To date only individual properties have been designated, the City does not have a WWRHP historic district. The list of properties on this register is maintained by city staff as an Excel list and in GIS but is not publicly accessible.

The City's historic preservation ordinance establishes the evaluation and designation of historic and prehistoric resources within the city under WWMC 2.27.010, empowers the HPC to initiate and maintain the City of Walla Walla Register of Historic Places (WWRHP) under WWMC 2.27.040(D)(2), and establishes the criteria for designating resources to the WWRHP under WWMC 2.27.050.

Resources that are nominated, eligible, and have the owner's consent, per WWMC 2.27.050(B)(4), are designated by the Commission to the WWRHP.

All WWRHP-designated properties, per WWMC 2.27.050(B)(5), are recorded in the City's official zoning records with an HP for historic property. The following table provides a list of WWRHP-designated properties.

*Table 3. Local Register Designated Properties<sup>54</sup>*

ADDRESS	NAME
18 N Second Avenue	Pantorium Cleaners and Dye Works
310 S Second Avenue	John and Christina Spansail Historic Home
111 N Sixth Avenue	Electric Light Works Building
423 N Seventh Avenue	Valaer Home
209 E Alder Street	Adolph Schwarz Building
229 E Alder Street	L. R. Hawley Building
119 W Alder Street	Garden City Buildings
1004 Alvarado Terrace	Louise and Robert Burns Home
1040 Alvarado Terrace	J. Arthur Ingalls Home
1050 Alvarado Terrace	James and Mamie McLean Home
1141 Alvarado Terrace	John and Annie Green Home
10 S Bellevue Avenue	Eugene Lennon Home
571 Boyer Avenue	Cornwell-McCausland Mansion
524 Catherine Street	A. K. Dice Home
501 E Cherry Street	Residence
11 N Colville Street	Corliss Motor Company
33 S Colville Street	Union Oil Service Station <sup>55</sup>
123 Eagan Street	Charles and Lucy Cooper Home
2 E Main Street	Paine Building
28 E Main Street	Sayer Building
61 E Main Street	C. J. Breier Building

54 Table data based on the Excel 2021 Updated Local Register list and historic sites GIS data provided by the city.

55 Also referred to as the Marcy's Service Station, 35 S Colville Street.



ADDRESS	NAME
51 E Main Street	Whiteside Building
57 E Main Street	Red Apple Café
104-106 E Main Street	G. H. Sutherland Building
2 W Main Street	Bachhus Building
30 W Main Street	America West Bank Building
215 W Main Street	Pastime Building
328 W Main Street	Snyder-Crecilius Paper Co.
43 S Palouse Street	Residence
216 S Palouse Street	Dr. C. N. Suttner Home
366 S Palouse Street	Edith S Chapman Holt Home
510 S Palouse Street	Fred E. Mojonnier Home
808 S Palouse Street	Whitehouse-Ankeny House
126 W Poplar Street	Charter Communications
35 S Spokane Street	Johnson Electric Building
145 Thorne Street	E. F. and S. E. King Home
803 Valencia Street	Elber Smith Home
740 Whitman Street	John Ankeny Home
1106 Woodlawn Street	A. C. and Lehla Thompson Home

### 3.4.2. National and State Register

The National Register of Historic Places (NRHP), authorized through the National Historic Preservation Act, and as stated in the National Register Bulletin 16A preface, “is the official Federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture.” Information on NRHP listed resources in Walla Walla is available through WISAARD.

The Washington Heritage Register (WHR), established in 1971, provides “an official listing of historically significant sites and properties found throughout the state.”<sup>56</sup> Listing to the WHR is honorary without any restrictions or design review requirements and requires owner consent for listing. Information on WHR listed resources in Walla Walla is available through WISAARD. This section addresses only built environment resources, as data on archaeological sites and traditional cultural properties is confidential and not accessible to non-archaeologists due to the potential risk to these resources.

The effect of a property listed on either or both the NRHP and WHR is largely honorary. Listing requires consideration of potential impacts to these properties when there is a federal or state nexus, such as permitting or funding, and consideration through SEPA review, see Section 3.1 Preservation Laws.

The Commission’s review role in the NRHP nomination process is to confirm if they agree that the nomination is worthy of listing and moving forward in the process. DAHP will provide the Commission with a document that meets NPS standards at the time. NRHP and/or WHR individual and historic district listing is entirely separate from the WWRHP designation process. The City’s certification as

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<sup>56</sup> Washington State Department of Archaeology and Historic Preservation. 2022. “Washington Heritage Register,” URL: <https://dahp.wa.gov/historic-registers/washington-heritage-register>, accessed 3/7/2022.

a CLG under the NHPA Amendments of 1980 (P.L. 96-515) and the City's historic preservation ordinance (WWMC 2.27.040(D)(15)) establish the duty and mechanism for HPC participation in the review only of NRHP nominations submitted for properties within the city limits. The process is described in Section VI of the HPC's bylaws.

The following table identifies historic districts listed to both the NRHP and the WHR within the City.

**Table 4. Districts Listed to the NRHP and WHR<sup>57</sup>**

NPS REF#	PROPERTY NAME	LOCATION	NRHP	WHR	LISTED DATE
74001985	Fort Walla Walla Historic District	77 Wainwright Drive	Yes	Yes	4/16/1974
SG10006868	Walla Walla Downtown Historic District	Roughly bounded by Rose Street, Palouse Street, alley between Alder and Popular Streets, and Third Avenue	Yes	Yes	6/29/2021, 9/3/2021

The following table identifies properties individually listed to both the NRHP and the WHR within the city. The level of significance pertains to the geographic scale of the historic context in which the resource is evaluated for significance with guidance provided under the section "Local, State and National Historic Contexts" in chapter V in *How to Evaluate A Property Within Its Historic Context*, National Register Bulletin 15.

**Table 5. Individually Listed to the NRHP and WHR<sup>58</sup>**

NPS REF#	PROPERTY NAME	LOCATION	LEVEL OF SIGNIFICANCE	LISTED DATE
00000189	Whitehouse-Crawford Planing Mill	212 N Third Avenue	Local	3/3/2000
00001448	Baumeister, Max, Building	27 W Main Street	Local	11/22/2000
11001013	Electric Light Works Building	111 N Sixth Avenue	Local	1/4/2012
14001245	YMCA Building-Walla Walla	28 S Spokane Street	Local	2/2/2015
74001984	Dacres Hotel	S Fourth Avenue and W Main Street	State	11/5/1974
74001986	Kirkman House	214 N Colville Street	State	12/27/1974
74001987	Memorial Building, Whitman College	345 Boyer Avenue	State	12/3/1974
74001988	Walla Walla Public Library (1)	109 S Palouse Street	State	11/20/1974

57 National Park Service. 2022. "National Register Database and Research," URL: <https://www.nps.gov/subjects/nationalregister/database-research.htm>, accessed 2/8/2022.

58 National Park Service. 2022. "National Register Database and Research," URL: <https://www.nps.gov/subjects/nationalregister/database-research.htm>, accessed 2/8/2022.

NPS REF#	PROPERTY NAME	LOCATION	LEVEL OF SIGNIFICANCE	LISTED DATE
80004011	Boyer, John F., House	204 Newell Street	State	8/11/1980
82004303	Ludwigs, George, House	125 Newell Street	Local	4/12/1982
82004304	Small-Elliott House	314 E Poplar Street	National	3/1/1982
83004274	Osterman House	508 Lincoln Street	Local	10/19/1983
89001949	Moore, Miles C., House	720 Bryant Avenue	State	11/13/1989
89002097	Walla Walla Valley Traction Company Car Barn	1102 W Cherry Street	Local	12/7/1989
90001604	Green Park School	1105 E Isaacs Avenue	Local	11/8/1990
90001862	Northern Pacific Railway Passenger Depot	416 N Second Avenue	Local	12/6/1990
91000660	US Post Office-Walla Walla Main (2)	128 N Second Street	Local	5/30/1991
91001737	Washington School	501 Cayuse Street	Local	11/21/1991
92001586	Butler, Norman Francis, House	207 E Cherry Street	Local	11/12/1992
93000358	Liberty Theater (3)	50 E Main Street	Local	4/29/1993
99001461	Marcus Whitman Hotel	107 N Second Avenue	Local	11/30/1999
100004346	Bachtold Building-Interurban Depot	330 W Main Street	Local	8/27/2019
Properties listed under multiple property context are identified by a (#) after the property name, with the number corresponding to following number and context.				
(1)	Listed under the Carnegie Libraries of Washington TR (AD) MPS			
(2)	Listed under the Historic US Post Offices in Washington MPS			
(3)	Listed under the Movie Theaters in Washington State MPS			

The following table identifies resources within the city listed only to the WHR.

**Table 6. WHR Listed Property<sup>59</sup>**

SITE ID / SMITHSONIAN #	RESOURCE ID	PROPERTY NAME	PROPERTY TYPE	LOCATION	LISTED DATE
WW00179	676783	Saint Patrick Church, School and Rectory - Walla Walla	Building	415 W Alder Street	1/20/1995

<sup>59</sup> One resource within the city has been removed from WHR listing. This was the Walla Walla Armory/Arcadia Dance Hall (Resource ID 676760) listed in 1975 and formerly located at 27–33 E Main Street. Removal from listing occurred due to demolition and redevelopment of the site.



SITE ID / SMITHSONIAN #	RESOURCE ID	PROPERTY NAME	PROPERTY TYPE	LOCATION	LISTED DATE
WW00199	676791	Walla Walla Fair Pavilion	Building	363 Orchard Street	1/28/2005

There are several NRHP thematic and multiple property submissions (MPS) applicable geographically to the city; these are listed in the following table. These can be accessed through DAHP’s website. [URL: [https://dahp.wa.gov/sites/default/files/THEME\\_LIST%20FINAL\\_0.pdf](https://dahp.wa.gov/sites/default/files/THEME_LIST%20FINAL_0.pdf)]

An MPS facilitates the designation of individual properties by providing an overall context statement and the registration requirements for listing. An MPS focuses on a single theme and then identifies the property types that convey the historical or architectural significance of that theme.

*Table 7. Applicable NRHP Multiple Property Submissions<sup>60</sup>*

NPS REF#	MULTIPLE PROPERTY SUBMISSION NAME
64501130	Barns of Washington State
64000892, 64000893	Carnegie Libraries of Washington
64000896-64000897	Depression-Era Buildings
64500700	Grain Production Properties in Eastern Washington
64500702	Historic U.S. Post Offices in Washington
64500706	Movie Theaters in Washington State

As survey work continues the evaluation of residential areas surveyed should consider, for both documentation standards and eligibility evaluation, the above-referenced multiple property listing and the 2002 National Register Bulletin, “Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the National Register of Historic Places.”<sup>61</sup> This bulletin is accessible through the NPS website. [url: [https://home.nps.gov/subjects/nationalregister/upload/NRB46\\_Suburbs\\_part1\\_508.pdf](https://home.nps.gov/subjects/nationalregister/upload/NRB46_Suburbs_part1_508.pdf)]

### 3.5. CITY INTEGRATION

The integration of historic preservation into city policy, and cooperation among the various city departments is essential to the consistent application of WWMC 2.27 and the long-term preservation of the city of Walla Walla’s heritage.

This integration also supports the HPC responsibility per WWMC 2.27.040(D) to:

*(9) Review and comment to the city council on land use, housing and redevelopment, municipal improvement, and other types of planning and programs undertaken by any agency of the city, other neighboring communities, Walla Walla County, and the state or federal governments, as they relate to historic resources of the city of Walla Walla.*

60 National Park Service. 2022. “National Register Database and Research,” URL: <https://www.nps.gov/subjects/nationalregister/database-research.htm>, accessed 2/8/2022.

DAHP. 2022. “National Register of Historic Places, Studies/Presentations, List of Thematic/MPD Nominations in WA State,” URL: <https://dahp.wa.gov/historic-registers/national-register-of-historic-places>, accessed 2/8/2022.

*(10) Advise the city council generally on matters of Walla Walla history and historic preservation.*

*(14) Be informed about and provide information to the public and city departments on incentives for preservation of historic resources including legislation, regulations and codes which encourage the use and adaptive reuse of historic properties.*

The following sections summarize existing city policies that relate to historic preservation. This identifies pathways for historic preservation planning and projects to support and address multiple city goals and policies, as well as other aspects of the city's planning, building, and land use as these all exist in relation to one-another.

### 3.5.1. Comprehensive Plan

The comprehensive plan provides an important mechanism for integrating historic preservation with city planning and decision-making goals and policies to ensure coordination.

Part of the vision established in the *Walla Walla Comprehensive Plan 2040* is a Walla Walla that “preserves and builds on its history and culture,” and “is inclusive of all people and celebrates its diverse community.”<sup>62</sup>

The comprehensive plan's elements (e.g., chapters) of Community Character, Land Use, Housing, Economic Development, and Historic Preservation indirectly and directly support the role of historic preservation within the city and inform survey needs.

This historic preservation plan is separate from and builds upon the goals and policies established in the comprehensive plan, in particular the historic preservation element. Core to development of this plan is understanding the role of historic preservation within the comprehensive plan elements. The following identifies where each of these elements relates to historic preservation.

**Community Character** provides policies intended, in part, to “help ensure that as Walla Walla continues to grow, the character remains unchanged.”<sup>63</sup> Character is informed by a variety of things: surveys, historic contexts, documenting underrepresented groups, and investment in, retention of, and adaptive reuse of historic resources.

Historic preservation activities support the following community character goals:

*Goal 1: Walla Walla's historic character is a primary source of its civic identity and attracts visitors wanting to experience an authentic and vibrant western community.*

*Goal 4: Downtown is the heart of Walla Walla, making all people feel welcome, accommodating a wide variety of civic and commercial functions, and reflecting the city's history.*

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62 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, I-1.

63 City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, I-2, CC-1-18.

**Land Use** places emphasis on “infill development, increased residential densities, and greater flexibility for mixed-use developments” to support growth and development.<sup>64</sup> The reuse of existing buildings reduces landfill impacts, and the compatible upgrading of building systems supports long-term sustainability and energy use reduction.

Historic preservation activities support the following land use goals:

*Goal 1: Walla Walla grows in a responsible way that maintains or improves the quality of life for its residents.*

*Goal 3: There are a variety of uses allowed throughout Walla Walla that encourage options for housing and business.*

*Goal 4: Land use is sustainable and conserves natural resources.*

**Housing** seeks to “allow for a greater variety of housing forms, leading to better availability of affordable housing.”<sup>65</sup> The existing variety of historic multiple family housing types, financial incentives for historic building rehabilitation, adaptive reuse of historic buildings, and the design precedence of historic middle housing all contribute to supporting and managing growth in a manner compatible with the historic character of the city. Historic apartment buildings in and adjacent to downtown can provide an important stock of smaller unit rental housing to serve single-person households or small families. Financial incentives for the repair and maintenance of historic buildings can support multiple-family housing retention and compatible single- to multiple-family conversions that increase density in a manner compatible with the surrounding neighborhood.

Historic preservation supports the following housing goals:

*Goal 1: A broad range of housing choices is available to meet the needs of people of diverse socioeconomic status, household type, and age.*

*Goal 2: Attractive and functional neighborhoods are welcoming to all types of households.*

**Economic Development** supports economic development and growth, building on the city’s quality-of-life appeal, local economy, and tourism.<sup>66</sup> Historic resources strengthen the local economy when they are positioned as a benefit for quality of life and tourism, coupled with the revenue generated locally from the rehabilitation of historic buildings. The city’s historic buildings provide an important aspect of past investment in the city’s infrastructure, support established businesses, and provide low-cost incubation space for startup businesses.

Historic preservation supports the following economic development goals:

*Goal 2: Walla Walla has high-quality infrastructure to support economic development.*

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64 City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, I-2, LU-1-12.

65 City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, I-2, H-1-18.

66 City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, I-2, ED1-8.



*Goal 4: Walla Walla has a supportive environment for entrepreneurial opportunities and startup businesses.*

*Goal 6: Downtown Walla Walla is full of thriving businesses and is recognized and celebrated as the center of the community.*

**Historic Preservation** provides formalized City policy to provide guidance in recognizing and supporting the relationship between the city's residents and historic resources to "define the character of the city and its inhabitants, create a strong sense of place, enhance the quality of life of residents, and connect those residents to the city's heritage."<sup>67</sup> The element builds upon the city's award winning legacy of working with stakeholders, including residents, investors, and organizations such as the Downtown Walla Walla Foundation and Walla Walla 2020, to support and advocate for historic preservation.

The historic preservation element established the following goals to support historic preservation.

*Goal 1: Historic structures are preserved through adaptive reuse or other methods.*

*Goal 2: Walla Walla residents are broadly aware of historic preservation in the city.*

*Goal 3: Historic preservation promotes economic vitality.*

*Goal 4: Lands, sites, and structures with historic significance are identified and preserved.*

*Goal 5: Heritage tourism is thriving in Walla Walla.*

**Shoreline Master Program** addresses Mill Creek as an asset to the city, and the city's only shoreline waterbody.<sup>68</sup> Survey and inventory work directly informs Section 5.4, Archaeological and Historic Resources, Policy 1 through 3, via the identification and evaluation of potential historic and cultural resources. Mill Creek has been formally determined eligible for the NRHP by DAHP and the portion that flows through the downtown is listed as part of the NRHP Walla Walla Downtown Historic District.

Historic preservation supports the following goals:

*Goal 15: To identify, protect, and preserve shoreline sites that have historic, cultural, educational, or scientific significance or value.*

### 3.5.2. Subarea Plan

A subarea plan is the product of a focused planning effort to provide goals, policy, and action items targeted to the needs of the resources in a specific geographic area. The city has only one subarea plan.

The *Downtown Master Plan*, developed in 2004, provides a framework in response to growth and development activity in and adjacent to downtown. It was prepared in response to surrounding institution-

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67 City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, HP1.

68 City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, SMP-5.

al growth by Whitman College and St. Mary's Hospital. The plan used the area established in the 1989 *Downtown Walla Walla Redevelopment Plan* and provides policies and implementation strategies for Downtown Walla Walla, including portions of Mill Creek within downtown. The design guideline recommendations from this plan led to the development of the *Design Standards for Downtown Walla Walla*, WWMC 20.178.

### 3.5.3. Land Use and Zoning

Zoning provides an important tool to support the continuation of historic uses and compatible new uses within historic buildings, as well as compatible new development within historic districts. In this way, zoning can indirectly support the retention of historic properties.

The city's first zoning ordinance has since been updated and expanded multiple times, with the current zoning code under Title 20. The code, per WWMC 20.02.040(A-D) designates land use zones, organizes development processes, provides for utility development, and provides for citizen involvement. Resources listed to the WWRHP per WWMC 2.27.050(B)(5) receive an "HP" designation on the official zoning records; however, this does "not change or modify the underlying zone classification." Per WWMC 20.14.020(B)(9) the act of designating historic resources to the WWRHP is exempted from review under Title 20.

### Conversion, Demolition, or Deconstruction of Historic Structures

Resources listed to the WWRHP have demolition review. For properties that are 45 years or older and not listed in the WWRHP, the city has a mechanism for the review of conversion or demolition under WWMC 20.146. This mechanism applies to structures listed to either or both the NRHP and WHR if they are not listed to the WWRHP.

The mechanism for **conversion** of a structure in a residential district to a nonresidential use, through a Level III conditional use permit, relies on both neighborhood and historic character compatibility. For properties with a historic structure, the approval is conditioned based on subsequent WWRHP designation of the historic structure. Comments are solicited from the HPC with the hearing examiner providing the decision. The approval is conditioned on the structure then being designated to the WWRHP.

**Demolition** of a structure 45 years or older per WWMC 20.146.040(A) triggers outreach by the City to DAHP, the HPC, local groups (such as Walla Walla 2020) and a notification to the local newspaper followed by a 10-day hold period to seek comments on the potential historic or architectural significance of the structure. If the structure is potentially WWRHP eligible, this is followed by a 60-day consultation period to explore options for avoidance or mitigation of the loss and would require SEPA review under WWMC 21.08.181(C)(2)(f) if the construction of the replacement structure would have been otherwise exempted by subsections (C)(1) and (2) of this section. There are currently no mechanisms requiring deconstruction of a historic resource that cannot be retained.

### Adaptive Reuse of Nonresidential Buildings in Residential Zones

A mechanism for the adaptive reuse of nonresidential buildings in residential zones is provided under WWMC 20.167. This supports the retention and use of the buildings along major and minor arterials and collector streets. The purpose of this is to reduce demolition and avoid cost prohibitive structural upgrades. This mechanism is not limited to historic structures.

## Design Standards for Downtown Walla Walla

The *Design Standards for Downtown Walla Walla*, WWMC 20.178, builds on the work completed through the *Downtown Master Plan* to provide standards to guide compatible new construction and the rehabilitation of existing historic buildings. New construction design features addressed in the standards include setbacks and heights, facade modulation, building materials and colors, openings (entrances and windows), exterior lighting, fencing, and signage. This review is conducted by the Site plan review committee (SPRC) per WWMC 20.10.050(A)(2) as part of a site and building permit application.

The HPC has no role in this review. This review does not replace or supersede design review through the HPC for WWRHP designed properties. If a building is also listed on the WWRHP, then the HPC will also review it and issue a certificate of appropriateness.

### 3.5.4. Building Code

The building code provides an important tool to support both life safety and the retention of historic buildings. Title 15, Buildings and Construction, provides the city's building regulations and WWMC 15.04.016 adopts the 2018 International Existing Building Code (IEBC).

RCW 19.27.120 under the State Building Code provides for alternative compliance pathways for historic buildings when authorized by the local building official and will result in the building being less hazardous than the existing building.<sup>69</sup>

### 3.5.5. Municipal Properties

The city's management of historic municipal properties can serve as an important example to the community of best practices and shared responsibility for the stewardship of the city of Walla Walla's heritage. The Capital Facilities and Utilities element within the 2018 *Walla Walla Comprehensive Plan Update* provides goals and policies for the management of these assets.<sup>70</sup>

City-owned facilities include water (waste, storm) and solid waste facilities, as well as fire and emergency service, police, parks and recreation, library, and municipal services facilities. Parks and recreation facilities are addressed under the Parks, Trails, and Markers section. City Hall is a contributing building within the Downtown Walla Walla NRHP historic district. No other facilities are listed to a historic register—local, state, or federal.

### 3.5.6. SEPA

The previous section, 3.1.b. State, provides an overview of the purpose and process for SEPA. The procedures and policies for SEPA compliance are addressed through WWMC 21.08. SEPA provides a mechanism to identify potential environmental impacts, including to historic and cultural resources, that may result from governmental decisions. These decisions can include adopting policies and plans, issuing permits to private parties, public construction projects, or adopting regulations. For most private projects in Walla Walla, the city will be the lead agency with the responsibility for identifying and evaluating proposals to determine if there is a probably significant environmental impact.

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69 State Building Code, "RCW 19.27.120 Buildings or structures having special historical or architectural significance – Exception," URL: <https://app.leg.wa.gov/RCW/default.aspx?cite=19.27.120>, accessed 2/22/2022.

70 City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, CFU-1.



All land use applications under levels I through VI are reviewed by the development services department to determine if SEPA review is required. If yes, then no approval or permit is issued until SEPA review is complete. Per WWMC 20.10.050(A)(1) the site plan review committee (SPRC) acts “as the environmental review body, in an advisory role to the responsible official, for review of environmental considerations required by SEPA.”

Projects for new construction or repair and remodeling not meeting the categorical exemptions under WWMC 20.14.081 require the completion of a completed SEPA Environmental Checklist.

The demolition of structures or facilities with recognized historical significance, per WWMC 21.08.181(C)(2)(f), are not exempted from SEPA review, even if they would have been exempted were they to not have historical significance. The demolition of a structure 45 years or older per WWMC 20.146.040(A) triggers an evaluation for potential historic or architectural significance of the structure which can result in the preservation of the structure via relocation, deconstruction and salvage of historically significant architectural features and materials and documentation and interpretation of the structure as a condition of issuance of the demolition permit, pursuant to WWMC 20.146.040 (B)(1).

### 3.5.7. Floodplain

Chapter 12, “Jurisdiction Specific Hazard Mitigation City of Walla Walla” in the *Walla Walla County Multi-Jurisdictional Hazard Mitigation Plan* (HMP), revised in 2020, identifies the risk rating for flooding as high, with a high probability and a high vulnerability. The report indicated a risk for flash flooding with Mill Creek as the main concern, but no frequently flooded areas within the city.<sup>71</sup> FEMA has not developed a flood map for the city.<sup>72</sup>

Floodways exist along Mill Creek east and west of the city limits, and south of the city along Russell Creek. None of these areas overlap with known historic built environment resources. Development in floodplains is managed through WWMC 21.10.

## 3.6. INCENTIVES

Incentives supporting historic preservation provide pathways for the city and commission to work with and support property owners, business owners, and residents in the preservation of the city of Walla Walla’s heritage. The existence of incentives recognizes that there is a community benefit to the retention of community character with the preservation of historic properties, and they support the intent, outlined in the *Comprehensive Plan 2040*, of using incentives to support historic rehabilitation projects of housing in downtown Walla Walla.<sup>73</sup>

The design review and controls that are typically involved in using incentives recognize the need to protect the public investment. These generally all leverage the limited public funds available to encourage and support private investment.

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71 Northwest Management, Inc. 2018, rev. 2020. *Walla Walla County Multi-Jurisdictional Hazard Mitigation Plan (HMP)*, prepared for the Walla Walla County Emergency Management Department, 114.

72 FEMA. 2022. “FEMA Flood Map Service Center: Search By Address,” URL: <https://msc.fema.gov/portal/search?AddressQuery=walla%20walla#searchresultsanchor>, accessed 2/24/2022.

73 City of Walla Walla. 2018. *Walla Walla Comprehensive Plan Update*, CC-10.

The following summary supports the HPC's responsibility, per WVMC 2.27.040(D)(16), to "Investigate and report to the city council on the use of various federal, state, local or private funding sources available to promote historic resource preservation in the city."

### 3.6.1. Federal Historic Rehabilitation Tax Credit (HTC)

The Federal 20% Historic Rehabilitation Tax Credit (HTC) is a 20% tax credit that serves as a useful tool to support private investment in the repair and rehabilitation of historic income-producing buildings. Statewide, over 300 projects, on average 15 per year, have utilized the program for a combined total exceeding \$1.3 billion. Project sizes range from \$14,000 to over \$73 million. Nationwide, over \$30.8 billion in tax credits have been approved. The rehabilitation work upon which these tax credits were claimed generated a net gain of over \$35.9 billion in Federal tax receipts.<sup>74</sup> The tax revenue stream from rehabilitation work going to the federal government exceeds that of the tax credits, which are lost revenue. The main limitation to its use in communities is the substantial rehabilitation expenditure threshold that requires the project amount to be more than 100% of the building's value (adjusted basis excluding the land).

There have been eight projects within the city that sought to utilize incentives, and three have successfully completed the process.<sup>75</sup>

**Table 8. HTC Projects**

NPS PROJECT NO.	ADDRESS	HISTORIC NAME	PROCESS PROGRESSION
43910	11 N Colville Street	Teague Motor Company	Part 1, approved 10/7/21 No Part 2 submitted to date
38419	328 W Main Street	Walla Walla Interurban Depot	Part 1, approved 7/24/18 Part 2, approved 6/6/19 Part 3, approved 6/6/19
31941	77 Wainwright Drive	Fort Walla Walla Officer's Quarters	Part 1, approved 3/20/15 Part 2, approved 5/8/15 Part 3, approved 9/20/16
30794	28 S Spokane Street	Walla Walla YMCA	Part 1, approved 8/20/14 Part 2, approved 10/7/16 Amendment 1, approved 11/21/16 Amendment 2, approved 9/11/18 No Part 3 submitted

<sup>74</sup> Washington State Department of Archaeology and Historic Preservation. Federal Historic Tax Credit, "What is It?" URL: <https://dahp.wa.gov/grants-and-funding/federal-historic-tax-credit>, accessed 2/22/2022.

<sup>75</sup> National Park Service. *Technical Preservation Services*, "Check Project Status," URL: <https://tpsdev.cr.nps.gov/status/>, search by city, "Walla Walla," accessed 2/21/2022.

NPS PROJECT NO.	ADDRESS	HISTORIC NAME	PROCESS PROGRESSION
26203	111 N Sixth Avenue	Walla Walla Gas & Electric Company's Electric Light Works	Part 1, approved 7/12/11 Part 2, approved 12/12/11 Amendment 1, information requested 3/27/13 Amendment 2, approved 8/22/13 Part 3 information requested.
6022	107 N Second Avenue	Marcus Whitman Hotel	Individually NRHP listed, no Part 1 needed Part 2, denied, 8/18/00
4437	212 N Third Street	Whitehouse-Crawford Building	Part 1, approved 6/25/99 No Part 2 submitted
1622	517 N Cayuse Street	Washington School	No Part 1 needed Part 2, denied 7/21/97 Part 3, approved 4/29/99

The small number of projects utilizing the program is attributed in part due to the newness of the Walla Walla Downtown NRHP historic district, which reduces the burden to property owners of seeking individual NRHP designation, and that project costs must exceed 100% of the building values (adjusted basis, excluding the land). Looking at the Walla Walla County Assessor improvement (building only excluding land) valuation provides a rough estimation of the amount a project would need to expend in order to qualify for the program. For commercial buildings within the Walla Walla Downtown NRHP historic district, this ranges from most (55 parcels) being under \$500,000, with the next most frequent range being in both the \$500,000 to just under \$1 million (21 parcels) and \$1 to \$2.7 million (17 parcels) ranges. For a building valued at \$1.6 million, without considering adjusted basis, the project would need to spend over \$1.6 million to qualify.

The tax credit is 20% of the total qualified rehabilitation expenditures and is claimed as part of the federal income tax filing generally, once the project is complete and the building placed in service. Appendices E and F of the 2004 *Downtown Walla Walla Master Plan* provide rehabilitation examples and cost analysis data, that although out of date, effectively lay out the process for evaluating the financial feasibility of projects. For details on the program see Appendix D. and visit the DAHP website link: <https://dahp.wa.gov/grants-and-funding/federal-historic-tax-credit>

### 3.6.2. Special Valuation (SPV)

Established as a statewide property tax reduction incentive, the Washington State Legislature during its 1985 session stated in RCW 84.26.010 that “it is in the public interest of the people of the state of Washington to encourage maintenance, improvement, and preservation of privately owned historic landmarks as the state approaches its Centennial year of 1989. To achieve this purpose, this chapter provides special valuation for improvements to historic property.”

Nearly 40 years later, the special valuation program continues to provide an important incentive supporting the rehabilitation and maintenance of commercial and non-commercial resources. Since 2000,



when DAHP began tracking projects, over 600 projects have utilized the incentive, leveraging over \$1.03 billion in rehabilitation work supporting community revitalization and job creation.<sup>76</sup> Within the city of Walla Walla, over 32 projects have utilized the program.

The program is administered at the local level through the Walla Walla County Assessor and the HPC. Properties eligible to utilize this incentive are those listed to the WWRHP, either individually or as a contributing resource to a WWRHP-listed district, per WWMC 2.27.070(C)(1). Review and monitoring by the HPC is governed under WWMC 2.27.070 and WWMC bylaws.

Utilizing a property tax reduction program takes a long-term view towards the stability and increase of property values and tax revenue. The program enables money spent on the rehabilitation or repair of a designated historic property to be deducted from its assessed value (combined land and building), and then property taxes are calculated on the remainder. This tax reduction runs for a period of 10 years. After the 10-year period, the special assessment no longer applies, and taxes are calculated based on the full assessed value.

To qualify for the program, the improvements must be substantial (at least 25% of the assessed value of just the building, excluding the land within a 24-month period), and meet the Secretary of the Interior's Standards for Rehabilitation.

This program helps to offset increases in property value due to improvements and encourages the ongoing repair and maintenance of historic properties. This program can be combined with the Federal Rehabilitation Tax Credits to provide an added incentive for commercial building owners. For more information, see: <https://dahp.wa.gov/grants-and-funding/special-tax-valuation>

For historic multiple-family and mixed-use buildings, this program provides a more potent incentive than the Multi-family Mixed-use Tax Credit program under WWMC 2.28, which, "in the case of rehabilitation of existing buildings, the exemption does not include the value of improvement construction prior to submission of the completed application required under this chapter." It is also limited to downtown as a subset of the Central Commercial Zone.

**Table 9. SPV Projects**

ADDRESS	NAME	SPV AGREEMENT YEAR
310 S Second Avenue		2009
111 N Sixth Avenue	Electric Light Works Building	2013
423 N Seventh Avenue		2016
119-125 W Alder Street	Garden City Buildings	2007, 2009
210 E Alder Street	W. H. Harold Building	2015
1004 Alvarado Terrace		2013
1040 Alvarado Terrace	J. Arthur Ingles House	ca. 2009
1050 Alvarado Terrace	The McLean-Dietrich House	2009
10 S Bellevue Avenue	The Old Brick House	2009
571 Boyer Avenue	Cornwell Mansion	2016
524 Catherine Street	A. K. Dice Home	2006
33 S Colville Street	Union Oil Service Station	2008
123 Eagan Street	Charles Cooper Home	2009

<sup>76</sup> Washington State Department of Archaeology and Historic Preservation. 2016. *Special Valuation*, "What is it," URL: [https://dahp.wa.gov/sites/default/files/SV\\_flyer.pdf](https://dahp.wa.gov/sites/default/files/SV_flyer.pdf), accessed 2/24/2022.

ADDRESS	NAME	SPV AGREEMENT YEAR
102–106 E Main Street	G.H. Sutherland Building	2006
2 E Main Street	Paine Building	Undated
215 W Main Street	Pastime Café	2016
28 E Main Street	Sayer Building	2018
30 W Main Street	Gardner Building	2003
328 W Main Street	Bachtold Building/Interurban Depot	2018
51–53 E Main Street	Whiteside Building	2013
57–61 E Main Street	C. J. Breier Building	2004
366 S Palouse Street		ca. 2007
43 S Palouse Street	Corman's Cycle Shop	2009
510 S Palouse Street		2010
808 S Palouse Street	Whitehouse-Ankeny House	2018
126 W Poplar Street	McDonald Feed & Sale Stable	2014
2–8 Rose Street	Pantorium Building	2007
35 S Spokane Street	Johnson Auto Electric Building	2011
145 Thorne Street		2011
803 Valencia Street		2009
740 Whitman Street		2011
1106 Woodlawn Street		2010

### 3.6.3. Energy Efficiency

The retention and continued use of historic buildings, and the reduction in materials sent to the landfill from demolition, is supported through work on historic buildings that meets the Secretary of the Interior's Standards for Rehabilitation and increases energy efficiency, reduces operating costs, and improves occupant comfort levels. Historic buildings often already incorporate efficient design elements, such as operable windows and skylights and central boilers that support steam and hot water radiators. The original materials and assemblies in historic buildings, particularly wood windows, often have a durability and life span that far exceeds modern materials.

Part of making energy efficiency upgrades to historic buildings is integrating improvements in a manner that does not diminish the architectural integrity of the building, which includes retaining original, often efficient, elements, such as wood windows.

Examples of sustainability programs in the region:

- Boise, ID: The livability program started in 2015 and includes the goal of shaping Boise as an environmentally sustainable community. (embed link: [Livability Report | City of Boise](#)) This is further reinforced through the inclusion of energy efficiency concepts in design guidelines for residential historic districts. (embed link: [residential-historic-guidelines\\_4-8-14.pdf](#) ([cityofboise.org](#))).
- Washington State Department of Archaeology and Historic Preservation: Offers program guidance on the integration of historic preservation and sustainability, quantifying the benefits, and how to undertake compatible upgrades to historic buildings. (embed link: [Sustainability | Washington State Department of Archaeology & Historic Preservation \(DAHP\)](#))

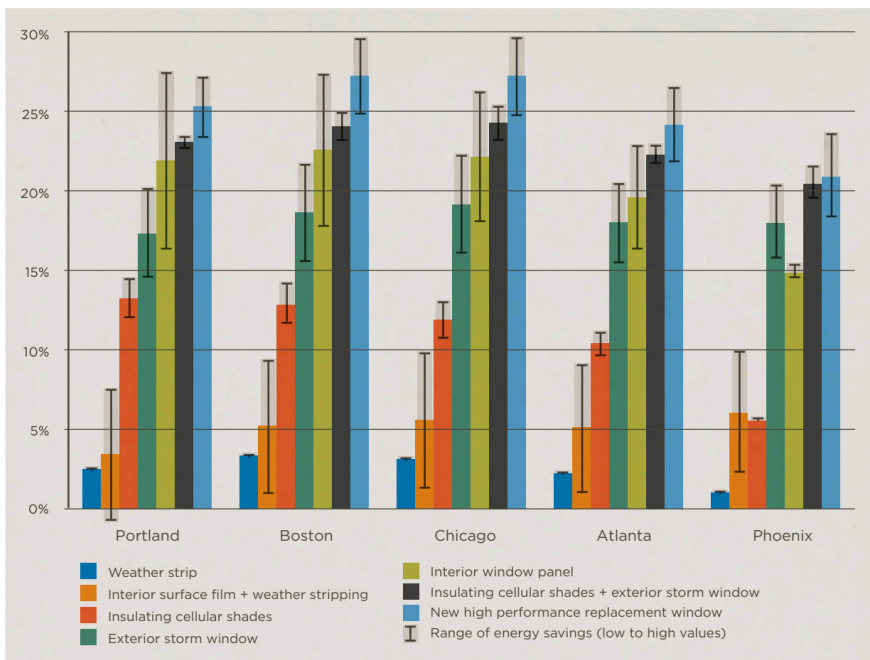
Non-city owned utilities provide electricity and natural gas to the city. These utilities are all under the oversight of the Washington Utilities and Transportation Commission (WUTC).

- Pacific Power provides electricity.<sup>77</sup>
- Columbia Rural Electric Association distributes power purchased from BPA.<sup>78</sup>
- Cascade Natural Gas Company is the sole natural gas provider.<sup>79</sup>

Each of the above utilities offer residential and commercial rebate programs to support a reduction in energy use. All three include incentives for upgrades to heating and cooling systems; building insulation (roof, attic, wall); and window and door replacement. The two electricity providers also offer rebates for lighting. All window and door rebates require the replacement of existing systems with new systems, without providing alternative pathways for historic buildings to retain original windows and exterior doors.

In the National Trust for Historic Preservation's Research & Policy Lab (formerly Preservation Green Lab) report, *Saving Windows, Saving Money: Evaluating the Energy Performance of Window Retrofit and Replacement*, researchers found that interior window panels, or a combination of insulating cellular shades and an exterior storm window, perform comparably to a new high performance replacement window, and can be less expensive.<sup>80</sup>

Annual Percent Energy Savings For Various Window Upgrade Options



Annual Percent Energy Savings for Various Window Upgrade Options from *Saving Windows, Saving Money: Evaluating the Energy Performance of Window Retrofit and Replacement* (2016).

77 Pacific Power. 2022. *Wattsmart Business*, 'Washington,' URL: [https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/savings-energy-choices/wattsmart-business/washington/WA\\_wattsmart\\_Business\\_Incentive\\_Lists.pdf](https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/savings-energy-choices/wattsmart-business/washington/WA_wattsmart_Business_Incentive_Lists.pdf), accessed 2/24/2022.

78 Columbia REA. 2022. *Rebate Offers*, URL: <https://www.columbiarea.coop/energy-efficiency/rebate-offers/>, accessed 2/24/2022.

79 Cascade Natural Gas. 2022. *Commercial Rebates*, URL: <https://www.cngc.com/energy-efficiency/commercial-rebate-offerings/>, accessed 2/24/2022.

80 Preservation Green Lab. 2016. *Saving Windows, Saving Money: Evaluating the Energy Performance of Window Retrofit and Replacement*, URL: <https://forum.savingplaces.org/connect/community-home/librarydocuments/viewdocument?DocumentKey=59eab0e4-f0f4-45c5-97c8-147a8def82ae&CommunityKey=00000000-0000-0000-0000-000000000000&tab=librarydocuments>, accessed 2/24/2022, 6.



### 3.6.4. Main Street Program

The success of the Downtown Walla Walla Foundation has been nationally recognized with multiple awards. Since its beginning in 1984 as the Walla Walla Main Street Foundation, the foundation has worked with the community and property owners to support the preservation and economic development of downtown Walla Walla. The foundation participated in developing the 1989 *Downtown Redevelopment Plan* and the 2004 *Downtown Master Plan*; the design guidelines from the 2004 plan were adopted and have shaped the character of downtown. The foundation's work in 2013 to develop the *Walla Walla Residential Guideline*, a handbook to support building owners in activating vacant or underutilized upper stories for residential development, is also an important tool for mixed-use buildings throughout the city.

The effects of the foundation's work are well-stated in the introduction of a 2008 RLS survey of downtown Walla Walla:

*"When the National Trust for Historic Preservation designated Walla Walla one of America's Great American Main Streets in 2001, it documented the dramatic change that began in the 1980s, when a wave of public concern and private investment turned downtown from a near wasteland with a 30% vacancy rate into a showplace of rehabilitation and a symbol of community pride. That reputation has endured, and the intrinsic value of the City's past is largely what creates the sense of place that has attracted national recognition and substantial investment."*<sup>81</sup>

### 3.6.5. Grant Program

The city currently does not have a grant program specific to designated historic properties. The Downtown Walla Walla Foundation had a former low-interest facade loan program, established in 1987 with the support of local banks, as well as a Local Improvement District approved by City Council in 1991.

Grant programs are in use by multiple cities in the Northwest and provide a mechanism to support investment in the city's historic commercial buildings which in turn support the role of downtown as a destination for both residents and visitors.

Funding mechanisms for the grants vary. For example, preservation grants through 4Culture in King County, Washington, receive funding primarily through lodging taxes (<https://www.4culture.org/about-4culture/revenue-sources/>). The Heritage Capital Project grant program funded restoration and stabilization work on the Kirkman House Museum and is available to Washington nonprofits, tribal organizations, local governments, ports, and public development authorities.

Grant funds, such as those received through energy efficiency rebates, can be counted towards the substantial rehabilitation threshold for the Federal Rehabilitation Tax Credit program and the tax credit amount if they are treated as gross income and considered taxable.

If non-taxable grants were received, these can be used for the purpose of meeting the substantial rehabilitation threshold, but not included in the qualified rehabilitation expenditures claimed by the owner for calculating the tax credit.

Examples of historic preservation grants in other cities and counties in the Northwest:

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81 Dowling, Jill. 2008. *Reconnaissance Level Historic Property Survey of Downtown Walla Walla, Washington*, prepared for the City of Walla Walla, 1.

- Yakima, WA: The Downtown Association of Yakima has been providing matching grants (50/50) to building owners in downtown Yakima, a program in operation since 2015. For more information see: <https://downtownyakima.com/business/facade-improvement/>
- King County, WA: Landmarks Capital and Preservation Special Projects grants are available through 4Culture. The capital grant supports physical repair and rehabilitation work for designated historic properties. The special projects grant supports a wider range of projects including planning, designation, education, and survey work. For more information see: <https://www.4culture.org/grants/landmarks-capital/> and <https://www.4culture.org/grants/preservation-projects/>
- Nampa, ID: Provides design assistance and construction reimbursement for downtown businesses of up to 50% (maximum \$40,000) of the cost of facade restoration as a five-year forgivable loan. For more information see: <https://www.cityofnampa.us/1180/Facade-Program>; <https://www.mainstreet.org/blogs/national-main-street-center/2019/06/06/new-facade-improvement-fund-established-to-transfo>
- Tacoma, WA: Provides Heritage Project Grants that can include work for historic register listing and site documentation and assessment, including historic structures reports and condition assessments. The matching grants range from \$1,000 to \$10,000 for projects. For more information see: [https://www.cityoftacoma.org/government/city\\_departments/planning\\_and\\_development\\_services/historic\\_preservation/heritage\\_project\\_grant\\_program#:~:text=The%202021%20Heritage%20Grant%20Program,goals%20regarding%20equity%20and%20antiracism](https://www.cityoftacoma.org/government/city_departments/planning_and_development_services/historic_preservation/heritage_project_grant_program#:~:text=The%202021%20Heritage%20Grant%20Program,goals%20regarding%20equity%20and%20antiracism).
- Thurston County, WA: Provides a grant program funded through recording fees from the County Auditor to support historic preservation under RCW 36.22.170. Project types range from documentation to capital repairs. For more information see: <https://www.co.thurston.wa.us/permitting/historic/historic-grants.html>.
- Ellensburg, WA: Provides a grant program to support the maintenance and restoration of downtown historic properties. For more information see: <https://ci.ellensburg.wa.us/709/Restoring-Maintaining-Downtown-Propertie>.

## 4. Goals and Policies

Walla Walla has a rich history reflected in its cultural resources, both archaeological and built environment. The community made the formal commitment to protect cultural resources when the City formed the historic preservation program in 2002 and adopted its historic preservation ordinance, becoming a Certified Local Government (CLG).

This chapter features a vision statement, mission statement, and five goals to guide ongoing work by the City's historic preservation program. These are grounded on the five goals with their supporting policies set forth in the Comprehensive Plan (2018). These goals, policies, and action items were developed following a review of current historic preservation policy in Walla Walla, conversations with stakeholders, and looking at the community survey results. The action items stem from recommendations listed in chapter 5 and are organized in chapter 6.

A **vision statement** captures what community members value about their community's heritage and the long-term role they want historic preservation to have in shaping the character and growth of their community. This vision statement is inspired by language in the Historic Preservation Element of the Comprehensive Plan.

A **mission statement** is directly connected to the vision statement, describing how the City's historic preservation program will work to support the City in achieving the vision.

**Goals** are broadly-based statements intended to set forth the general principles that express priorities of community value and guide public policy to directly support the mission and achieving the long-term vision. These goals build on the goals established in the Historic Preservation Element of the Comprehensive Plan.

**Policies** are guidelines to integrate historic preservation into City decision-making in order to reach the goals by supporting coordinated development.

The goals and policies support the specific recommendations outlined in chapter 5 "Recommendations" and the resulting proposed courses of action in chapter 6 "Action Plan."

### 4.1. VISION STATEMENT

Walla Walla will work with stakeholders to seek ways to celebrate and preserve its unique character while adapting to change.

### 4.2. MISSION STATEMENT

Walla Walla's historic preservation program will protect and honor the city's diverse cultural resources through broad and deep public outreach and consistent application of the historic preservation ordinance.

### 4.3. GOALS

The following goals support the vision and mission of Walla Walla's historic preservation program and will guide ongoing work. The order of the goals reflects their priority. These goals utilize the framework of the goals in the Historic Preservation Element, but are updated and reorganized to reflect conversations with stakeholders, the results of the community survey, and NWV's review of current policy.



**Goal 1:** Identify, evaluate, and nominate cultural resources.

**Goal 2:** Protect cultural resources.

**Goal 3:** Inform Walla Walla residents and provide access to information on historic preservation in the city.

**Goal 4:** Promote historic preservation as an essential aspect to economic vitality.

**Goal 5:** Ensure authenticity guides heritage tourism in Walla Walla.

## **Goal 1. Identify, evaluate, and nominate cultural resources**

Clear identification and evaluation processes facilitate development review, provide pathways for managing identified resources, and support policy and incentive development for resources designated through the nomination process. Identifying cultural resources is the first step in preservation and will be an ongoing effort for the City. The NRHP and WWRHP use 50 years as the age threshold for cultural resources (except if younger properties are of exceptional significance), so every year more properties meet that standard. After cultural resources are identified and documented—typically through survey and inventory work—the City can better account for them in its planning and encourage broader use for the historic preservation program.

This goal refines and reprioritizes Goal 4 in the Historic Preservation Element of the Comprehensive Plan, which states, “Lands, sites, and structures with historic significance are identified and preserved.”

### **HP Policy 1.1 Continue seeking grant opportunities to conduct cultural resource surveys.**

This policy (HP Policy 4.3) in the Historic Preservation Element of the Comprehensive Plan specified “historic building inventories of neighborhoods.” While surveying historic buildings is important and a large part of historic preservation, future survey and inventory work should consider the range of historic and cultural resources. Survey and inventory work is critical for the City to maintain an up-to-date understanding of historic and cultural resources within the city limits.

### **HP Policy 1.2 Work with residents and property owners to establish preservation districts with design guidelines.**

Local preservation programs provide the opportunity for a community to identify historic resources and define how they should be protected. Design guidelines within historic districts or conservation districts should be based on the Secretary of the Interiors Standards but also reflect the specifics of Walla Walla and the district in question. Historic preservation is most successful not when it halts all change, but when it manages and guides it within the context of compatibility to the surrounding historic environment. The creation and adoption of design guidelines must have rigorous public outreach to ensure the community and property owners can provide feedback so the resulting guidelines have general support. This policy was HP Policy 4.1 in the Historic Preservation Element of the Comprehensive Plan.

## **HP Policy 1.3 Encourage designation to the Walla Walla Register of Historic Places**

Designation to the WWRHP is the most straightforward way to ensure the preservation of historic resources in Walla Walla. The City and HPC should encourage designation, but also improve public access to what is listed and increase understanding of the results of designation.

## **Goal 2. Protect cultural resources.**

This goal supports the social, cultural, environmental, and economic benefits of protecting cultural resources. How resources are protected can take multiple forms, for example, through procedures in an inadvertent discovery plan, or via financial incentives to support active use through building rehabilitation. This goal demonstrates the City's commitment to historic preservation and the importance of protecting cultural resources. It refines Goal 1 in the Historic Preservation Element of the Comprehensive Plan, which stated, "Historic structures are preserved through adaptive reuse or other methods." That goal in the Comprehensive Plan excluded archaeological and traditional cultural properties, as well as the range of historic resources, which include buildings, structures, sites, districts, and objects.

## **HP Policy 2.1 Protect archaeological resources and traditional cultural properties.**

The historic preservation ordinance affords the opportunity to protect the historic built environment, but also archaeological resources and traditional cultural properties. The locations of these resources are confidential and should be protected, but also considered in planning and development within the city.

## **HP Policy 2.2 Broaden and clarify the role of historic preservation within the City's decision making.**

Historic preservation is an interdisciplinary field—it can combine architecture, history, sustainability, culture, archaeology, art, and economics. Pursuing opportunities to connect the HPC with other city commissions or departments can expand understanding of preservation and demonstrate how historic preservation connects with other fields. The HPC can improve its functionality and decision making with updates to the Historic Preservation Ordinance and the Bylaws of the Historic Preservation Commission.

## **HP Policy 2.3 Encourage alternatives to demolition of cultural resources.**

This policy in the Historic Preservation Element of the Comprehensive Plan (HP Policy 1.1) specified "architecturally significant structures," but NWV recommends a broader focus to all historic resources rather than limiting demolition review to those that are architecturally significant. Demolition review is a key tool for protecting significant historic properties because it ensures there is proper notice, some level of review by the HPC, and consideration of alternatives to demolition.

## **HP Policy 2.4 Prohibit the demolition of cultural resources eligible for listing on a historic register for the construction of parking.**

This policy in the Historic Preservation Element of the Comprehensive Plan (HP Policy 1.2) establishes the City's commitment to prioritize historic resources over surface parking lots. A code amendment to specify this will formalize this policy.

**HP Policy 2.5 Reuse existing public buildings in such a way that civic and historic design elements are preserved, and encourage school districts, Whitman College, and Walla Walla County to reuse structures rather than tear them down.**

The City has the opportunity with historic municipally owned buildings to demonstrate the value of historic preservation and reflect best practices to the community. This can serve as a model for other institutions in town that are stewards of historic properties. This policy was in the Historic Preservation Element of the Comprehensive Plan as HP Policy 4.2.

**Goal 3. Inform Walla Walla residents and provide access to information on historic preservation in the city.**

Public outreach and education is a critical component of a historic preservation program. Walla Walla residents value the city's history and cultural resources, but there can be a disconnect between that history and the historic preservation program. Regular engagement with the community and making the information as readily accessible as possible are essential to sustaining an effective historic preservation program. Making information available to the public helps people to engage with, and learn about, historic preservation at their own pace and need, such as a developer planning a project, or a neighborhood resident wondering if they live in a historic district.

**HP Policy 3.1 Expand the community's understanding of cultural resources through a strengthened relationship with the Confederated Tribes of the Umatilla Indian Reservation and broadening the range of historic properties and stories that are documented.**

Walla Walla has a rich and deep history. It is multi-faceted and far more complex than what has been written to date. The people and ancestors of the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) have stewarded the land in and around Walla Walla since time immemorial. A strengthened relationship with the CTUIR will enrich the community's knowledge of Walla Walla's history. The varying ethnic, cultural, religious, and socioeconomic groups that have lived and worked in Walla Walla over time are not as well documented as the dominant white Euro-American narrative; there are many opportunities to expand the understanding around these additional stories and the related historic and cultural resources. This policy begins through outreach from the Historic Preservation Commission to the CTUIR Cultural Resources Committee to determine their interest as well as from the City of Walla Walla to the CTUIR Cultural Resources Protection Program.

**HP Policy 3.2 Provide educational materials in a variety of formats that outline the benefits of historic preservation and encourage renovation, restoration, and infill construction throughout the city.**

There are many misconceptions about historic preservation—from what is “historic” to what the actual results of designating a historic resource mean. The City can and should be a resource for citizens to find answers to questions related to historic preservation. This can include written and visual materials, but should also expand to training programs, lectures or public talks, and walking tours. The City should also provide training to city staff to ensure that there is broad understanding of historic preservation beyond the HPC. This policy was HP Policy 2.2 in the Historic Preservation Element of the Comprehensive Plan.



## Goal 4. Promote historic preservation as an essential aspect to economic vitality.

The character of place conveyed through extant cultural resources goes hand-in-hand with supporting the quality of life and local industries that draw repeat visitors and retain residents. Historic preservation can have a reputation of being difficult and costly; however, that money stays in the community and the character of place that is created is long-term and can't be moved to another location. PlaceEconomics—a nationally recognized private sector firm leading the way in quality, defensible research of the economic impacts of historic preservation—published “Twenty-Four Reasons Preservation is Good for Your Community” in January 2020. Half of the reasons directly relate to economic vitality and the other half influence or contribute to it. Preservation projects are more labor intensive, with a “greater job-creating impact per dollar spent than new construction.”<sup>82</sup>

Please note, the Historic Preservation Element identifies HP Policy 3.4 as “Establish Downtown Walla Walla, as identified in Downtown Walla Walla Intensive Level Survey, as a National Historic District.” This policy has been removed from the Preservation Plan, because Downtown Walla Walla Historic District was listed in the National Register of Historic Places in 2021.

### **HP Policy 4.1 Provide assistance and education to developers, landowners, and interested citizens in obtaining grants and tax incentives for the reuse and rehabilitation of designated cultural resources.**

There are a variety of financial opportunities available to designated historic properties, but these programs are only successful if individuals are aware of them and know how to utilize them. This policy was HP Policy 2.1 in the Historic Preservation Element of the Comprehensive Plan

### **HP Policy 4.2 Publicize historic preservation projects and highlight the economic benefits.**

Highlighting historic preservation projects increases awareness about the historic preservation program and provides an opportunity to promote the economics related to preservation. Sharing this information with the general public is important to encourage preservation, but it should also be regularly provided to City Council. This policy was HP Policy 3.1 in the Historic Preservation Element of the Comprehensive Plan

### **HP Policy 4.3 Encourage adaptive reuse of historic structures through incentives such as local register designation and accessing special valuation property tax benefits.**

Raising awareness about the available financial incentives for designated historic resources is invaluable to encouraging their use. However, the expenditure thresholds can be out of reach for smaller projects. The development of local grant programs or incentives could allow more developers, landowners, and citizens to receive assistance in maintaining or reusing their historic properties. This policy was Policy 3.2 in the Historic Preservation Element of the Comprehensive Plan

## Goal 5. Ensure authenticity guides heritage tourism in Walla Walla.

Heritage tourism is a prominent industry in Walla Walla that not only drives the economy but also encourages the protection of cultural resources. Authenticity underpins the entire experience of Walla

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<sup>82</sup> PlaceEconomics “Twenty-Four Reasons Preservation is Good for Your Community” (January 2020), <https://www.placeeconomics.com/wp-content/uploads/2020/01/City-Studies-WP-Online-Doc.pdf> (accessed April 8, 2022).

Walla for residents and visitors. This is tied to protecting cultural resources, utilizing the *Secretary of the Interior's Standards for Rehabilitation* when considering alterations to buildings, structures, and landscapes to retain integrity of design, materials, location, and workmanship. For interpretive and educational materials, authenticity is tied to seeking out stories that have not been and should be told, and presenting those in an inclusive way.

**HP Policy 5.1 Actively encourage and promote Walla Walla as a heritage tourism destination, including attractions such as historic barns/farms, historic wineries, the historic downtown, charming historic neighborhoods, local history sites, Fort Walla Walla Museum, Frenchtown Historic Site, Whitman Mission, Kirkman House Museum, walking tours, and biking tours.**

The range of cultural resources present in Walla Walla provide an opportunity to promote heritage tourism.

**HP Policy 5.2 Utilize heritage tourism materials to engage with Walla Walla residents.**

Heritage tourism is important. But the people that already live and work in Walla Walla are also important. Efforts made to promote heritage tourism should also be used to connect Walla Walla residents with the city's history and historic resources.

**HP Policy 5.3 Continue to honor local historic sites not designated on the City's local register.**

This policy was listed as HP Policy 4.4 in the Historic Preservation Element of the Comprehensive Plan and specified honoring historic sites not in the WWRHP "by supporting placement of informational markers on public and private property, with property owner consent, such as the markers placed by the Walla Walla 2020 Historic Sites and Makers project." This is a good action item, but as a policy should be expanded to promote a range of ways to honor historic places.

Not all historic resources within the city are designated in the WWRHP or even the NRHP. Many are eligible and can be designated. There are other resources that may not qualify but are still valuable elements to the city's history. Plaques and markers can help tell those stories to the public, but walking tours, place naming, and events can also be more active and participatory ways to honor the city's history.

## 5. Recommendations

The following recommendations outline actions to consider in support of historic preservation city-wide. This section is organized into four overarching categories: programmatic updates, survey and inventory, city planning integration, and economic promotion. Numbers that follow a recommendation correspond to an applicable section found previously in the Plan. Implementation action items from the *Comprehensive Plan 2040* are integrated with their full text into the following recommendations. This is a full list of recommendations; each recommendation is included in Chapter 4. Goals and Policies with the relevant goal and supporting policy.

### 5.1. PROGRAMMATIC UPDATES

The following recommendations relate to the city's preservation program and are organized into the following types:

- Ordinance Updates
- Historic Preservation Commission & Bylaws Updates
- Local Registers

#### 5.1.1. Ordinance

We recommend the following Historic Preservation Ordinance updates to provide clarification, limit redundancy, and ensure consistency in language with other sections of the Walla Walla Municipal Code.

- Implement a series of language updates to WWMC 2.27 Historic Preservation Ordinance. See Appendix E for specific language changes.

#### 5.1.2. Commission & Bylaws

We recommend a series of updates to the Bylaws of the Historic Preservation Commission to provide additional support to the HPC in decision making and finetune their processes.

- Include the full text of the Secretary of the Interior's Standards for Rehabilitation in the Bylaws for Commissioner use during design review and public use in understanding the ten standards that will be used in evaluating the proposed alterations. <https://www.nps.gov/tps/standards/rehabilitation.htm>
- Implement a series of language updates to the Bylaws so that they function as rules and regulations supplementing but not duplicating the Historic Preservation Ordinance. See Appendix F for specific language changes.
- Change WWMC 20.42 Violations and Enforcement to include WWMC 2.27.050. Current language under WWMC 2.27.050(D)(2) states that "violation of this rule shall be grounds for the commission to review the property for removal from the register." This does not afford protection for the community interest and value of the historic resource and provides a pathway for subsequent property owners to delist a property through alterations or demolition. A potential concern is a property owner listing their property to the WWRHP, and then the purchase of that property by a new owner, and the City code being unable to protect the WWRHP listed property from demolition or alterations. The HPC needs a legal enforcement mechanism within the City to support them in the event the owner of a WWRHP listed property is unwilling to participate in the certificate of appropriateness process.



- Undertake a process to update WWMC 2.27 to address demolition by neglect, economic hardship, conditional approval to include mitigation, and criteria utilized by the HPC in considering a waiver of the certificate of appropriateness for demolition of a property. These changes should be made to WWMC 2.27 and not the Bylaws to have the language in one location for the public and in the established municipal code. WWMC 2.27.060 provides guidance on the review process and the HPC Bylaws, Section II (B)(d) provide guidance on the level of documentation required by the HPC for consideration of a waiver of the certificate of appropriateness for demolition of a property. Relevant examples include the City of Tacoma having dealt with several prominent demolition by neglect cases and the City of McMinnville in the process of updating their demolition ordinance. This supports and expands the implementation action “Develop and provide clearer demolition review procedures within the municipal code (Goal 1)” within the Comprehensive Plan 2040.<sup>83</sup>
- Code amendment to prohibit demolition of structures for construction of parking lots (Goal 1, Comprehensive Plan 2040).
- Update the City’s “Residential/Commercial Demolition Application” to include under the Required Documents section a check box for whether the property is listed to the WWRHP and provide information on where the applicant can find this information.<sup>84</sup>
- Require a pre-application conference with City planning staff prior to Commission Review of proposed demolition of historic structures to outline financial incentives and/or code relief available for historic properties and instruct applicants on the level of detail required for the demolition permit application. The intent is both to seek alternatives to demolition, and if that is not possible, to inform the applicant about the level of information necessary for the Commission review.
- Extend the review period under WWMC 2.27.060(C)(3) to 60 days to match the time-period under WWMC 20.146.040(B)(1).
- Change language in WWMC 2.27.050(D) to address demolition by neglect and include a requirement for affirmative or minimum maintenance standards to address structural defects or hazards; defective or inadequate weather protection; or defects increasing the hazards of fire or accidents. The WWMC does not provide a definition for or consequences for demolition by neglect – add the definition to WWMC 2.27.030 as provided below. The National Trust for Historic Preservation defines demolition by neglect as “the term used to describe a situation in which a property owner intentionally allows a historic property to suffer severe deterioration, potentially beyond the point of repair. Property owners may use this kind of long-term neglect to circumvent historic preservation regulations.”<sup>85</sup>
- Consider establishing a community preservation fund, facade grant program, and/or minimum maintenance revolving fund that could be paid into as part of mitigation for demolition and/or funded through the cost of demolition permits.
- Develop economic hardship decision criteria that the HPC must consider when reviewing a request for a waiver of a certificate of appropriateness for demolition. The type of evidence required to demonstrate economic hardship must be spelled out in the preservation ordinance. The National Trust for Historic Preservation addresses “economic hardship” in its Preservation Law Educa-

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83 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, HP-11.

84 City of Walla Walla. 2018. “Residential/Commercial Demolition Application,” URL: <https://www.wallawallawa.gov/home/showpublisheddocument/2186/636837595032400000>, accessed 2/25/2022.

85 National Trust for Historic Preservation, “Preservation Law Educational Materials...Demolition by Neglect,” <https://forum.savingplaces.org/HigherLogic/System/DownloadDocumentFile.ashx?DocumentFileKey=ccd565f7-27f1-fcd7-f3a9-351b5a7b645b&-forceDialog=0> (accessed March 10, 2021).

tional Materials and states, “Under many preservation ordinances economic hardship is defined as consistent with the legal standard for an unconstitutional regulatory taking, which requires a property owner to establish that he or she has been denied all reasonable beneficial use or return on the property as a result of the commission’s denial of a permit for alteration or demolition.”<sup>86</sup>

- Develop language requiring that historic structures that cannot be preserved are deconstructed to preserve and reuse historically significant architectural features as part of required mitigation.
- Reduce the language in Section VI: National Register Review by retaining the first four paragraphs, and then revising the rules and procedures language to convey that the review will be included on the agenda and conducted as part of a regularly scheduled Commission meeting using documentation provided by DAHP to determine if the Commission agrees that the nomination is worthy of listing and worthy of moving forward in the process.
- Note that for reference, the Commission does not determine a category of historic property, its level of significance, or if the nomination meets NPS standards, that will have been done by DAHP.
- Develop a matrix identifying what is reviewed by City staff or the HPC based on the type of work involved and the process steps involved in consultation with City staff. The intent is to both clarify roles and responsibilities for staff and the HPC and to make the process more accessible for building owners. Examples include the following:
  - » Miami Dade County COA Review matrix.
  - » Spokane City and County: <https://www.historicspokane.org/wp-content/uploads/2010/08/Design-Review.pdf>

### 5.1.3. Local Register

We recommend the following local register changes to improve public access to the information and tracking of listed properties.

- Implement a process to record the meeting date that a property’s listing took place to reference the vote and any decision elements, and to package these elements as a single PDF for linking in the above referenced GIS map for each WWRHP property.
- Update the WWRHP nomination form to include a signature line for owner consent to listing, as the nomination form does not have a line stating that by signing, they consent to listing and identify them as the fee simple owner.
- Listing data is not being transmitted for every property to the County assessor, as the property details for some buildings under the assessor property record data have a line for “Historic Property” with “N” (no) recorded for the WWRHP listed properties sampled, including some with special valuation agreements. Others had a “Y” (yes) recorded. Conveying this data to the county will assist in informing real estate sales. Coordinate with the Walla Walla County assessor to ensure that historic listing data is transmitted to their records when a property is listed to the WWRHP and/or a special valuation agreement is recorded. This should also include a statement within the deed that the property is designated to the Walla Walla Register of Historic Places, the date and number of designation, and that this statement gets transferred and noted to a new property owner.

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86 National Trust for Historic Preservation, “Preservation Law Educational Materials...Assessing Economic Hardship Claims Under Historic Preservation Ordinances,” <https://forum.savingplaces.org/HigherLogic/System/DownloadDocumentFile.ashx?DocumentFileKey=ea48dae0-5ade-d1ca-7bfd-e830fbadb462&forceDialog=0> (accessed March 10, 2021).

- Confirm if the following are WWRHP listed or not. The following are identified in GIS under sub-type 892 as WWRHP listed; however, they do not show up in the City’s 2021 Updated Local Register list.

**Table 10. WWRHP Properties to Confirm**

PROPERTY NAME	ADDRESS
Stewart’s Dry Cleaners	214 E ALDER ST
Pioneer Park (and if listed, which aspects are included in the listing)	940 E ALDER ST
Sears Sew and Vac	102 E MAIN ST

- Establish preservation districts for neighborhoods, work with residents and property owners (Goal 4, Comprehensive Plan 2040).<sup>87</sup> This could start with neighborhoods that have surveyed/ inventoried, including Green Park and Germantown.
- Develop design standards for identified neighborhoods to manage change and density increases through compatible middle-housing development prioritized to vacant lot and non-contributing building replacement, that increases housing, places housing in proximity to existing infrastructure, and contributes long-term to the neighborhood character and sense of place (Goal 4, Comprehensive Plan 2040).<sup>88</sup>

## 5.2. SURVEY AND INVENTORY

Consistent survey and inventory work is key to maintaining the city’s awareness of historic resources throughout the city limits. Several areas were identified for future survey work due to age, location, and concentration of resource types. We recommend the following areas to consider for future survey and inventory work, largely based off a review of Assessor year-built data, previous surveys, Walla Walla 2020 researched properties, URM survey data, and NRHP, WHR, and WWRHP listed property data, subdivisions and year recorded, and zoning data. The intent of the reconnaissance level survey recommendations is to also support the *Comprehensive Plan 2040* community character intent of “analyzing the components that define local neighborhoods also helps to guide future zoning and design standards as well as to preserve and celebrate the city’s neighborhoods.”<sup>89</sup>

All historic resource surveys must be led or conducted by professionals meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History.

### 5.2.1. City-wide

- The following recommendations address survey work that would extend city-wide or across multiple neighborhood areas and seek to increase the evaluation of post-World War II era resources.
- Connect with Whitman College art history classes in advance of planned historic resource work to determine if student research projects align with the survey area. This does not replace the work of a consultant and is not meant to be a class in survey and inventory, but to provide an opportu-

87 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, HP-11.

88 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, HP-11.

89 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, CC-2.



nity for students to begin research that can inform survey work and foster a relationship between the college and the HPC.

- Prioritize survey and inventory projects that can expand understanding and document the history of underrepresented and historically marginalized communities. Build in oral history components to allow for stories not documented in traditional resources to be identified. Potential ideas include the Chinese in Walla Walla, women's history, LGBTQA+ history, and redlining and restrictive covenants.
- Reach out to the CTUIR to determine their interest in partnering to prepare a traditional use study to identify and document traditional land use patterns within the city limits of Walla Walla. If possible, continue this work into the built environment to identify extant historic resources with tribal connections. A traditional use study includes a literature review of existing pre- and post-contact ethnographic and historical information, oral history interviews, and other primary and secondary ethnographic and historical source material. Pursue grant funding for this project.
- Consider partnering with Whitman College, Fort Walla Walla Museum, [The Listeners Project: Queremos Escucharte](#), and others to pursue grant funding for a Latinx survey in the Walla Walla Valley.
- City-wide multiple family dwelling RLS and historic context. The intent is to determine if there is potential thematic eligibility for NRHP and WWRHP listing to support HTC and SPV use for these income producing properties; to confirm and update URM survey data; and to identify the seismic retrofit need for property owner support.
  - » This includes multiple family dwellings 50-years or older and not previously surveyed at the RLS or ILS level. Building forms include all non-single family residential forms, including but not limited to apartment buildings (low, mid, high-rise, courtyard), mixed-use commercial with ground floor commercial and upper story residential, duplexes, triplex, and bungalow courts. This work should confirm which are URMs and update URM data (14 buildings based on current data), determine potential individual eligibility (NRHP, WHR, WWRHP), identify extant multiple family forms and characteristics, overall integrity levels, development, and integration with neighborhoods patterns to inform middle housing new construction infill patterns.
  - » Survey approximately 100 resources at the RLS level, including at least one example of each building form and geographically distributed throughout the city based on extant resources. This supports the *Comprehensive Plan 2040* Housing Goal 1, which states that “A broad range of housing choices is available to meet the needs of people of diverse socioeconomic status, household type, and age.” This is prioritized over the URM survey as it combines both URM updates and supports housing. This supports the 2004 *Downtown Master Plan* issue 5 “Residential development should be considered a critical component to Downtown, which supports existing and proposed retail and commercial uses.”<sup>90</sup>
- URM survey data update. The intent is to improve the City's dataset around URMs to inform planning and property owner support in retrofitting buildings. The 2018 Washington Unreinforced Masonry Building Inventory identified 137 known and suspected URMs within the city and included the recommendation for State government support to update information on historic status (listed or eligible), vacancy and underutilization, and Building and Site Characteristics data.<sup>91</sup> Part of the

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90 Winter, Noré V. 2004. *Downtown Master Plan*, adopted by the City of Walla Walla, 16-17.

91 Washington URM Dashboard, 2020. URL: <https://fortress.wa.gov/com/urmmasonry/urmmasonry/#15/46.0688/-118.3461/>, accessed 2/18/2022.

coordination with DAHP and the State Commerce Department should be to secure grant funding to collect this additional data, per the 2018 URM study recommendations.<sup>92</sup>

- Conduct an ILS of City parks that are 50 years or older to complete new and update the few existing inventory forms. The intent of this survey is to provide planning data to support the ongoing management of these resources as well as inform eligibility for potential grants to support repairs and improvements.
  - » The historic context for the survey should include a history of the Parks and Recreation Department and the development and role of parks and street trees within the city. An ILS versus RLS is recommended as the RLS does not provide adequate data to understand the original design and alterations to parks and their associated features.
  - » The survey should include the Highway 12 Trail, the Veterans Memorial Golf Course, and Mountain View Cemetery. Utilize “The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes” (1996) to inform landscape terminology used and the classification of organizational elements and character-defining features of each landscape. Refer to the National Park Service’s Technical Preservation Services guidance on how to preserve cultural landscapes (<https://www.nps.gov/tps/how-to-preserve/cultural-landscapes.htm>) and National Register Bulletin No. 18 “How to Evaluate and Nominate Designed Historic Landscapes.” (<https://www.nps.gov/subjects/nationalregister/upload/NRB18-Complete.pdf>) Based on the ILS findings, pursue WWRHP, WHR, and NRHP listing for eligible resources.
- Work with the City’s Parks and Recreation Department and Walla Walla Historic Cemeteries to determine if there is interest in surveying and evaluating the Mountain View Cemetery (established in the 1860s) for NRHP listing.<sup>93</sup> If there is, pursue this documentation. Refer to National Register Bulletin 41 “Guidelines for Evaluating and Registering Cemeteries and Burial Places” (1992) prepared by the National Park Service. <https://www.nps.gov/subjects/nationalregister/upload/NRB41-Complete.pdf>. This project could be eligible for funding through DAHP’s Historic Cemetery Grant program.
- Develop a list of municipal properties that are 50 years or older to lead by example and follow through with designations for any resources that are eligible. Conduct a reconnaissance-level survey of these properties to determine which might be NRHP eligible. Pursue NRHP listing for those properties that are eligible.

### 5.2.2. Neighborhoods

The following survey recommendations address different neighborhood areas within the city. [Note we anticipate these will be updated and revised based on stakeholder interviews, HPC, and staff review and have assigned a temporary ID [#] to each for ease of reference during the review process. Once the areas are finalized, we will assign unique identifiers to each area.]

- **[1] Langford’s Addition RLS and historic context.** The intent is identification of individually eligible resources for subsequent ILS work to support individual nominations and to inform the following Comprehensive Plan 2040 Community Character policies. This is a pre-emptive look at extant residential buildings in Heavy Industrial zoned areas anticipating SEPA review related to re-

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92 Architectural Resources Group. 2018. *Washington Unreinforced Masonry Building Inventory*, prepared for the Washington Department of Commerce, 47.

93 City of Walla Walla. 2018. Walla Walla Parks and Recreation Comprehensive Plan, 14.

development projects. The area is bisected by SR 12, which opened in 1973, and bordered by the downtown commercial core, highway commercial, public reserve lands, and light and heavy industrial uses.<sup>94</sup> Both areas are within the Comprehensive Plan 2040 Work Force Historic Character Area and encompass multiple plats with Langdon's being the principal plat. The areas have a high concentration of pre 1900s and 1900s, 1910s, and 1920s buildings. Context development should look at census data to understand past occupants and demographic patterns; and the impact of SR 12 development. Survey work associated with previous small scale projects in this area identified a moderate number of DNEs.

**Table 11. Langford's Addition Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	19	216	54	25	24

- **[2] Green's First Addition RLS.** The intent is to finish out the survey of Green's Park Addition based on the 2013 Green's Park Addition Reconnaissance Level Historic Survey recommendation and the potential for a historic district encompassing both or one of the plats. Update the 2013 historic context to include northeast section of the addition that was not surveyed as part of the 2013 RLS project. This stems from eligibility recommendations from the 2013 survey. This northeast section has a concentration of 1900s buildings in west portion, and 1930s and 1940s in east portion. Very little previous survey work has been done in the northeast section of the addition. This informs the following Comprehensive Plan 2040 Community Character policies.

**Table 12. Green's First Addition Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	0	63	92	17	3

- **[3] Roberts Addition RLS and historic context.** The intent is identification of individually eligible resources for subsequent ILS work to support individual nominations and to inform the following Comprehensive Plan 2040 Community Character policies. Roberts is the major plat, with multiple other smaller plats. The area has a high level of Walla Walla 2020 researched properties. There has been a moderate level of previous survey work closer to downtown with most having NDEs and those that have determinations most being DOE with only a few DNE. Construction ranges from 1890s to 1930s with some 1940s along the south edge. Most of the buildings date from the 1900s and 1920s based on assessor data.

**Table 13. Roberts Addition Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	24	337	116	55	36

- **[4] Cain's Addition RLS and historic context.** The intent is identification of a potential historic district and individually eligible resources for subsequent ILS work to support individual nominations and to inform the following Comprehensive Plan 2040 Community Character policies. The area is bounded by downtown, SR 12, and two schools and is within the Comprehensive Plan

94 Jenkins, Sarah (February 24, 1985). "WW's 'Berlin Wall'". Walla Walla Union-Bulletin. p. E4.



2040 Historic Character area abutting downtown. Based on the proximity to downtown there is likely to be high redevelopment pressure. The area has a high concentration of 1800s, 1900s, 1910s, with some 1930s and 1940s buildings. Project based survey work has identified multiple DNEs and a few DOEs within the area. There have been a few Walla Walla 2020 researched properties.

**Table 14. Cain's First Addition Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	7	173	41	46	6

- **[5] Reed's Addition RLS and historic context.** The intent is identification of a potential historic district and individually eligible resources for subsequent ILS work to support individual nominations and to inform the Comprehensive Plan 2040 Community Character policies. The area encompasses the full plat. Construction spans from the 1890s through the 1940s. There has been little previous survey work. Only a few buildings have been researched by Walla Walla 2020. This area is part of the Comprehensive Plan 2040 University character area and abuts Pioneer Park.

**Table 15. Reed's First Addition Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	2	90	29	13	0

- **[6] South Park Addition RLS.** The intent is identification of potential individually eligible resources for subsequent ILS work to support individual nominations and to inform the Comprehensive Plan 2040 Community Character policies. This area includes multiple small additions with a high number of 1890s, as well as 1900s development. The area is a residentially zoned area at the edge of the highway commercial. Only a few previous surveys and most DNE. No Walla Walla 2020 researched properties.

**Table 16. South Park Addition Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	6	106	22	17	12

- **[7] Babcock's Addition RLS.** The intent is identification of potential individually eligible resources for subsequent ILS work to support individual nominations and to inform the Comprehensive Plan 2040 Community Character policies. This area includes multiple smaller additions and it located at the south edge of downtown. Only a few properties have been researched by Walla Walla 2020. A moderate amount of previous survey work has been completed, with some DOE, but more DNE, and most NDE. Development ranges from 1890s to 1930s, with most buildings from the 1900s.

**Table 17. Babcock's Addition Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	8	148	39	26	15

- **[8] RLS, Bryant's Addition, Park Street Garden, and Bryant's Acres Tracts** area encompassing multiple plats with a different pattern in street layout from surrounding plats. Resources consist predominately of single-family homes. A few of the resources have been researched by Walla Walla 2020 and a few surveyed individually, including some DNEs. The range of building construction consists mostly of buildings built between the 1890s through 1940s.

**Table 18. Bryant's Addition, et al Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	2	155	77	62	14

- **[9] RLS, Isaac's Addition, Isaac's 2nd Addition, Isaacs 3rd Addition, Isaacs Park, College Addition.** The area has had little previous survey work. The area includes the Washington Odd Fellows Home. The area faces development pressure due to proximity to Whitman College. The intent is to identify individually eligible resources.

**Table 19. Isaac's Addition, et al Potential Resource Count**

DEVELOPMENT PERIOD	1859-1889	1890-1928	1929-1945	1946-1970	1971-2022
Resource Count	2	174	43	38	8

## 5.3. CITY INTEGRATION

We recommend a series of changes to City policies to better approach cultural resources (built environment and archaeology) issues in zoning, the comprehensive plan, and in consultation with Tribes and other agencies. The archaeological recommendations stem from guidance from DAHP related to archaeological resources. The intent is to better provide for the identification and protection of archaeological resources, during both public and private projects, through education and increased awareness.

### 5.3.1. Planning and Coordination

The following recommendations are intended to support improved coordination and planning relative to the management of historic resources.

- The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Cultural Resources Protection Program has expressed interest in sharing a First Foods presentation at a City Council meeting. Coordinate with City Council to invite them to share this presentation.
- Work with the Confederated Tribes of the Umatilla Indian Reservation to develop a memorandum of understanding (MOU) addressing cultural resources protection. CTUIR Cultural Resources Protection Program staff recommend starting with a meeting between technical staff and the HPC, followed by a meeting between the HPC and CTUIR's Cultural Resource Committee. The Cultural Resource Committee will then make a recommendation to the Tribes' Board of Trustees. And the HPC should make their own recommendation to Council to pursue development of the MOU.
- Adopt a standard inadvertent discovery plan (IDP) for use on projects involving ground disturbance where soil is to be moved or removed and make the plan available to the public on the

City's website under "Building Permitting."<sup>95</sup> Work with DAHP and the Confederated Tribes of the Umatilla Indian Reservation THPO to develop this plan. Refer to the SHPO's IDP template in the appendix for preliminary language. IDPs are important as they establish the protocol to follow in the event of a discovery. This should be a foundational step to codify protocols that may already be in use on projects subject to SEPA or Section 106 review. State Department of Ecology IDP example: <https://apps.ecology.wa.gov/publications/documents/ecy070560.pdf>

- Preserve and protect identified archaeological resources. Adopt a policy where if new development does not allow for the preservation of archaeological resources in place, they should be documented according to federal, state, and local standards and regulations.
- Develop policies and procedures for ground disturbing public and private work within the city requiring a permit to identify and address potential impacts to archaeological resources including a standard inadvertent discovery plan that can be included with permits involving ground disturbing work. Ideally these should apply city-wide, but in consultation with the THPO and SHPO, could consider their application first to areas of high likelihood for archaeological resources and traditional cultural properties. Good examples include:
  - » Refer to the City of Olympia Municipal Code Chapter 18.12.120 for an example (<https://www.codepublishing.com/WA/Olympia/?Olympia18/Olympia1812.html#18.12.120> )
  - » Permitting guidance example from Tacoma: <https://www.tacomapermits.org/wp-content/uploads/2020/06/G-139-Demolition.pdf>
- Work with the Confederated Tribes of the Umatilla Indian Reservation THPO and DAHP to identify areas of high likelihood for archaeological resources and traditional cultural properties within the city and develop policies to avoid and protect these resources so that they are not damaged. This information can help shape policies and actions based on risk level for different areas to focus resources on monitoring and pre-construction surveys to areas with a high risk.
- Work with the Confederated Tribes of the Umatilla Indian Reservation THPO and DAHP to provide training for City public works staff and field crews on how to recognize archaeological deposits in the field, and the proper policies and procedures to follow when deposits are identified.
- Support property owners in developing site stewardship plans to provide specific guidance and recommendations for landowners having archaeological sites on their property. How to preserve, protect and interpret sites. This depends on owner participation. For additional information: Site Stewardship | Washington State Department of Archaeology & Historic Preservation (DAHP).
- Work with the Confederated Tribes of the Umatilla Indian Reservation THPO, DAHP, the Fort Walla Walla Museum and historical societies to develop educational programs around what is archaeology and traditional cultural properties. This should include why these properties are important, display development, and building an understanding for archaeological resources and traditional cultural properties within the community. Greater awareness and appreciation for the resources helps support policies and actions protecting and stewarding these resources.
- WWRHP listed properties should be included as a layer in the city's interactive GIS map that is available to the public. A hyperlink should be included with each resource allowing downloading of the applicable HPC packet and staff report approved as part of the listing process.
- Listing data is not being transmitted for every property to the County assessor, as the property details for some buildings under the assessor property record data have a line for "Historic Prop-

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95 City of Walla Walla. URL: <https://www.wallawallawa.gov/government/development-services/building-and-land-use-permitting>, accessed 2/26/2022.

erty” with “N” (no) recorded for the WWRHP listed properties sampled, including some with special valuation agreements. Others had a “Y” (yes) recorded. Conveying this data to the county will assist in informing real estate sales.

- Adopt the Historic Preservation Plan as an element of the city’s comprehensive plan.
- Update capital repair plans for NRHP eligible municipal buildings. As part of planned repairs, prioritize the retention of original materials.
- Based on previous CTUIR suggestions, work with the CTUIR’s Cultural Resource Committee to revise and refine the following code example language based on the City of Olympia’s OMC 18.12.120 through 140 and published DAHP guidance to address the protection and management of archaeological resources and provide clearer guidance around process and best practices. Adopt the language once revisions are complete.

## **2.27.080 Archaeological Sites and Cultural Resources**

### **A. Inadvertent Discovery**

1. Whenever in the course of excavation or development, potential or known archaeological materials (e.g. bones, collections of shells, stone tools, beads, ceramics, old bottles, and old building foundations) or human remains are observed during project activities, the developer, contractor, and/or any other parties involved in construction shall immediately cease all on-site construction, shall act to protect the potential or known historical and cultural resources area from outside intrusion, and shall notify, within a maximum period of twenty-four hours from the time of discovery, the City of Walla Walla Historic Preservation Officer (HPO) and the City of Walla Walla Building Official. The HPO will contact the Washington State Department of Archaeology and Historic Preservation (DAHP), all interested Tribes. In the case of human remains, Walla Walla Police Department and Walla Walla County Coroner, in addition to the HPO and Building Official, shall be contacted immediately by the property owner or site manager for immediate response to evaluate the discovered materials.
2. Provided initial inspection indicates that the materials may be cultural resources or human remains, the City shall request DAHP and interested Tribes to recommend an appropriate course of action prior to resumption of construction. The property owner may be required to hire a qualified archaeologist to evaluate the site within seven (7) calendar days. The archaeologist shall make a recommendation on the site’s eligibility for the National Register of Historic Places (NRHP) as per the National Historic Preservation Act. This recommendation will be reviewed by DAHP and interested Tribes for determination of eligibility for the NRHP.
3. If the site is determined eligible for the NRHP, the HPO or designee shall consult with DAHP and all interested Tribes for recommendations on appropriate mitigation of effects before construction resumes. The Building Official may revoke or temporarily suspend the permit or add mitigation conditions based on the site’s archaeological importance. The discovery of archaeological materials requires that the property owner must comply with all applicable laws pertaining to archaeological resources. Failure to comply with this requirement could constitute a Class C Felony. If federal funds or permits are involved in the project, notification to the appropriate federal agency and the Advisory Council shall occur in addition to the above-listed parties.

### **B. Development Review**



1. Any alteration to an archaeological site requires a permit from DAHP per RCW 27.44 and RCW 27.53. Refer to <https://dahp.wa.gov/archaeology/archaeological-permitting> for the permit application. Archaeological sites are defined under RCW 27.53 .030(3) as places that contain archaeological objects. All sites with objects that pre-date the historic era (prehistoric) require a permit, regardless of the level of “disturbance.” Alterations to a site can include adding fill, building on, removing trees, using heavy equipment on, compacting, or other activities that would change or potentially impact the site.
2. Where previously recorded archeological sites are proposed for development, the Director shall consult DAHP and all interested Tribes for their recommendations, and may deny or condition the permit to avoid harm to or destruction of the archaeological site.
3. Interested Tribes and DAHP shall be notified when an application for land use approval has been submitted to the City of Walla Walla as described in WWMC 21.08.130 Public notice. Additional notice of consultation may be provided by the City Historic Preservation Officer.
4. Consistent with law, any recommendations and/or requests by Consulting Tribes and/or DAHP on cultural resource protection will be given substantial weight in decisions on land use approval and subsequent permit issuance.
5. Surveys, testing and evaluations, monitoring, and traditional use studies pertaining to archaeological and cultural resources conducted as part of development review or mitigation shall be conducted by a qualified professional archaeologist as defined in WAC 27.53.030(11).

#### C. Archaeological and Cultural Resource Protection

1. Archaeological and Cultural resources shall be protected from damage during construction and all other development activities in accordance with WWMC subsections 2.27.080(A) and (B).
2. Additional Protections for Archaeological and Cultural Resources.
  - a. Building permit recipients for development projects that meet the following criteria shall be required to sign an Inadvertent Discovery Plan (IDP) provided by the City of Walla Walla Historic Preservation Officer:
    - i. All projects subject to State Environmental Policy Act (SEPA) thresholds; and
    - ii. The signed IDP shall be held on site throughout the duration of any ground-disturbing activities related to the project.
  - b. The Director may require additional actions to protect known or predicted cultural resources as a result of requests submitted by Consulting Tribes and/or DAHP during consultation for the following:
    - i. Projects subject to State Environmental Policy Act (SEPA) thresholds;
    - ii. Projects subject to other State and Federal laws which protect cultural and historic resources, including but not limited to Executive Order 21-02 and Section 106 of the National Historic Preservation Act.

### 5.3.2. Economic Promotion

The following recommendations are intended to support the economic promotion of historic preservation within the city.

- Support and help sponsor any efforts to pursue National Heritage Area status for the Walla Walla Valley in coordination with other stakeholders (e.g., CTUIR, Fort Walla Walla Museum, Frenchtown). National Heritage Areas (NHAs) are places where historic, cultural, and natural resources combine to form cohesive, nationally important landscapes. Unlike national parks, heritage areas are lived-in landscapes. According to the National Park Service, “National Heritage Areas (NHAs) are created by Congress through federal law to promote the conservation of natural, cultural, and historic resources that combine to form a cohesive, nationally important landscape...NHAs provide a grassroots, community-driven approach to heritage conservation and economic development. Through public-private partnerships, NHA entities support historic preservation, natural resource conservation, recreation, heritage tourism, and educational projects. Matching federal funds and leveraging additional resources for projects, NHA partnerships foster pride of place and an enduring stewardship ethic.”
- Establish a city historic preservation and seismic retrofitting grant program. Based on the range of historic property types within the city, a general grant program rather than a facade conservation grant program for commercial buildings is recommended. Consider using demolition permit fees and mitigation funds to fund the grant program. For seismic retrofitting, also explore the use of a Heritage Capital Projects grant (33% of project), with property owner investment (34%) and in-kind match from the City (33%) to fund the seismic retrofit for WWRHP listed (or listed prior to project completion), mixed use and multiple family housing city-wide to support infrastructure and affordable housing development. The property owner could also utilize HTC (if NRHP listed) and SPV to further benefit.
  - » A historic preservation grant program communicates that there is an economic and community benefit for the retention of the city’s historic commercial building character; supports the reinvestment of money into local trades and craftspeople working on historic buildings; that it is expensive to remove intrusive elements, seismically retrofit, and undertake restoration of missing features; and that the community funds invested need to be protected, typically through local designation or a controls agreement restricting exterior alterations and demolition. This program can also serve as a receiving entity for mitigation fees paid in lieu of conducting project-specific mitigation due to building demolition. See the following for details: <https://ecology.wa.gov/Water-Shorelines/Wetlands/Mitigation>
  - » Grant eligibility must be tied to designation on the WWRHP. This provides a consistent and transparent process for eligibility and design review, protection of the community investment from demolition, and an incentive for local designation. Design review for preservation and restoration work must go through the HPC.
  - » The goal of this grant program is two-fold. One is to maintain and enhance the historic character of Walla Walla. The second is to bring buildings back to potential individual WWRHP and NRHP eligibility so that property owners of commercial buildings could utilize the federal rehabilitation tax credits and special valuation for work. Grant funds can count towards meeting threshold expenditures for the federal rehabilitation tax credit program. For projects that seek to regain NRHP eligibility, this will require close coordination with DAHP to evaluate what existed at the start of the project, eligibility and work being done, but it is possible. Examples include:

Spokane Historic Preservation Office » Façade Improvement Grant ([historicspokane.org](http://historicspokane.org))

- Include a link on the City website to the U.S. National Park Service Technical Preservation Services online guide to help property owners work through energy upgrades to their buildings. This online guide includes links to applicable preservation briefs and technical notes: <https://www.nps.gov/tps/sustainability/energy-efficiency/weatherization.htm>
- Hire a specialist to conduct workshops with interested property owners to assess and develop treatment approaches for the repair and weatherization of historic wood windows to assist property owners in planning for this work. Windows are a significant visual feature of buildings and often the target of deferred maintenance and then replacement with a new window. The old growth wood in the historic windows is an important asset to retain due to the length of its serviceable life. These workshops should include assessments to identify repair and upgrade needs and offer guidance on how to undertake this work. Often property owners work on their buildings themselves, so technical training can make this type of work accessible and affordable.
- Pull the case study examples from Appendix E of the 2004 *Downtown Walla Walla Master Plan* for renovation and adaptive reuse and make available on the HPC website as reference material.
- Continue to encourage property owners to consider the use of the federal rehabilitation tax credits and their integration with grants and energy incentive rebates in planning for substantial rehabilitation work on their buildings and to consult with DAHP on the potential use of this program.
- Continue to track Special Valuation usage, qualified rehabilitation expenditure total, building name, address, start/end for 10-year period, and agreement reference number. The goal is to be better able to monitor and to quantify extent of usage and benefits.
- Continue to encourage property owners to consider the use of the Special Valuation program.
- Pursue heritage capital grant funds for repair and improvement work on the Carnegie building. Pursue FEMA funding for the seismic retrofit of the building if this work has not already been completed. For more information see: <https://www.washingtonhistory.org/across-washington/grants/heritage-capital-projects/>.
- Refine education materials that outline benefits of historic preservation (Goal 2, *Comprehensive Plan 2040*).<sup>96</sup>
- Develop a program/process that highlights historic preservation projects (Goal 2 and 3, *Comprehensive Plan 2040*).<sup>97</sup>
- Expand visitor awareness of Walla Walla's heritage and its historic resources online and promote Walla Walla as a destination for cultural heritage tourists (Goal 3, and 5, *Comprehensive Plan 2040*).<sup>98</sup>
- Complete the Historic Mullan Road Site (*Comprehensive Plan 2040*).<sup>99</sup>

### 5.3.3. Land Use and Zoning

The following recommendations are intended to better integrate historic preservation into the city's land use and zoning code.

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96 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, HP-11.

97 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, HP-11.

98 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, HP-11.

99 City of Walla Walla. 2018. Walla Walla Comprehensive Plan Update, HP-11.

- The “HR” designation is not being recorded on the official parcel or zoning record based on a review of the City’s zoning and parcel layers in GIS. The “HR” should be recorded and include recording the date for the listing, such as “HR, listed 1/1/2022.”<sup>100</sup> This would allow staff, the building official, and the public to go to the meeting minutes for the HPC meeting at which the property was listed. A column should be added to record the unique identifier assigned to each property, such as “TAX-16-0002” for the 423 N 7th Avenue property and used as a hyperlink connection to the HPC packet with the staff analysis adopted by the HPC as part of the listing. These packets should be maintained separately from the HPC minutes and agenda materials as their retention period is indefinite or until the resource is de-listed. The online HPC minutes only go back to 2016 and the agendas back only to 2014. Where digital HPC packets are not available for listed properties, the hard copies should be scanned and made part of the digital record for public access.
- Language change in WWMC 20.146.010 for clarity and ease of public cross referencing and to make it easier for building owners to find section 2.27.060.

*Properties listed on the Walla Walla local historic register are subject to the requirements set forth in WWMC 2.27, inclusive of the city of Walla Walla historic commission bylaws, rules and procedures for design review, and special valuation.*

- Language change in WWMC 20.146.020(A)(2) to clarify the role of the HPC and its staff and what they must provide as part of this process, in part to fulfill responsibilities identified under WWMC 2.27.040(D)(5). This is particularly important as a condition of the approval is the property owner obtain WWRHP designation, and if the resource is not eligible that will be important to know. (Reference 3.5.3.).

*The site plan review committee shall review the proposal, and shall any comments solicited comments from the historical preservation commission regarding WWRHP eligibility and character-defining feature (and spaces if applicable) identification, and provide a report to the hearing examiner prior to the public hearing on the application.*

- Language addition under WWMC 20.146.040 to address the demolition of historic structures that are determined eligible for listing but demolished with mitigation conditions.

*WWMC 20.146.040(B)(3) At a minimum and in addition to any other mitigation as may be required, the mitigation for demolition of a WWRHP, WHR, or NRHP eligible resource shall consist of an intensive level survey (ILS) historic property inventory (HPI) form recorded in DAHP’s WISAARD. The work shall be completed by person(s) meeting the Secretary of the Interior’s Professional Qualification Standards for History or Architectural History. The work shall conform to DAHP’s Washington State Standards for Cultural Resource Reporting.*

*<https://www.nps.gov/subjects/historicpreservation/upload/standards-guidelines-archeology-historic-preservation.pdf>*

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<sup>100</sup> City of Walla Walla. 2022. “Zoning,” “Parcels,” URLs: ‘[https://gis.ci.walla-walla.wa.us/arcgis/rest/services/GIS-BaseMap\\_zoning/MapServer/0](https://gis.ci.walla-walla.wa.us/arcgis/rest/services/GIS-BaseMap_zoning/MapServer/0),’ and [https://gis.ci.walla-walla.wa.us/arcgis/rest/services/Energov/Energov\\_WWparcels/MapServer/0](https://gis.ci.walla-walla.wa.us/arcgis/rest/services/Energov/Energov_WWparcels/MapServer/0), accessed 2/14/2022; Walla Walla County. 2022. “Property Search,” URL: [http://propertysearch.co.walla-walla.wa.us/PropertyAccess/Property.aspx?cid=0&year=2021&prop\\_id=32468](http://propertysearch.co.walla-walla.wa.us/PropertyAccess/Property.aspx?cid=0&year=2021&prop_id=32468), accessed 2/14/2022.



- Language change under WWMC 20.146.040 to clarify that public notice of proposed demolition needs to be published in the local newspaper, and not just notifying the newspaper of the proposed action.

*A. A request for review of any proposed demolition shall be submitted for all structures forty-five years old or older prior to the submittal of a demolition permit application. A ten-day holding period shall be observed, following publication in the local newspaper, and notification to the local newspaper, Washington State Department of Archaeology and Historic Preservation, the historic preservation commission, and local interest groups having on file a request for notification of such applications.*

- Language addition in WWMC 20.14.040 to provide applicant guidance on additional application requirements when requesting a historic structure conversion under WWMC 20.146.020. This information is required for both the HPC (WWRHP eligibility evaluation and identification or confirmation of CDFs) and the Hearing Examiner (WWMC 20.14.040(4)(a)) to fulfill their review responsibilities. The following does not need to be exhaustive but is anticipated to be 2 to 3-pages. More information is generally helpful and will form the basis for the WWRHP nomination, assuming the structure is WWRHP eligible, and the conditional use is approved.
  - » Physical description: narrative description of the structure interior and exterior, including identification of past alterations (identifying year) and character defining features and if applicable, spaces. Refer to NPS Preservation Brief 17 Architectural Character – Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character. (<https://www.nps.gov/tps/how-to-preserve/briefs/17-architectural-character.htm>)
  - » Architect or builder: identify if known, and provide a brief biography, including their education, career and other known (identifying which are extant and former) works in Walla Walla.
  - » Significance statement: narrative identifying current, and past uses and owners, and their role in the city, state, and nation, in terms of the criteria for determining designation in the register listed in WWMC 2.27.050.
  - » A complete legal description.
  - » Photographs: clear exterior photographs of each facade; each major or significant interior space; neighborhood context; and historic photographs.
  - » Bibliography: source citations for background data.
- Language addition in WWMC 20.146.040 to require the applicant for a structure 45-years or older to include the following as part of the request for review including the following based on the City of Tacoma's example (<https://www.tacomapermits.org/tip-sheet-index/demolition-permits>). The intent is to provide a more consistent level of information.
  - » Identification of any NRHP, WHR, or WWRHP listed or designated structures on the subject property.
  - » Current photographs of all facades of affected structures, including any historic photographs.
  - » Development chronology for each affected structure, identifying date built, builder, occupants, and associated events.
- Language change in WWMC 20.146.040 to modify the review sequence to be staff for the initial review, HPC for WWRHP eligibility if staff review or public comment identify this potential eligibili-

ty, and then impact analysis along with additional background materials provided by the applicant to inform this process.

*A. A request for review of any proposed demolition shall be submitted for all structures forty-five years old or older prior to the submittal of a demolition permit application. A ten-day holding period shall be observed, following notification to the local newspaper, Washington State Department of Archaeology and Historic Preservation, the historic preservation commission, and local interest groups having on file a request for notification of such applications. Comments from the notified parties and the public related to the possible historic or architectural significance of the structure or place to the community will be reviewed by staff.*

*B. If, based on review of the request for review and comments received as per subsection A of this section, staff determines that the subject structure or place ~~possesses~~ includes NRHP or WHR eligible or listed structures, or any of the affected structures appear to meet the criteria for WWRHP designation, a Historic Property Assessment report will be required of the applicant for HPC submittal and review. ~~sufficient community-wide historic or architectural significance that further public input is warranted, the proposal will be subject to the following:~~*

*The Historic Property Assessment must be prepared by a qualified cultural resources consultant, and must contain:*

*Narrative statement which addresses the historical or cultural significance of the property, in terms of the Designation Criteria listed in WWMC 2.27.050; and*

*Narrative statement describing the physical condition of the property and an architectural description; and*

*Specific language indicating which improvements on the site are eligible for historic designation according to the Designation Criteria, including any significant interior features within publicly owned buildings; and*

*A complete legal description; and*

*A description of the character-defining features and architectural elements that contribute to the historic character of the property.*

*1. If the HPC finds the building eligible for WWRHP, then a ~~A~~ sixty-day staff level stay during which the director may consult with local and/or state organizations concerned with historic or architectural values. This consultation may include a meeting of the demolition request initiator with the historic preservation commission. Mitigation options such as allowing the structure to be moved, salvage of historic and/or reusable building materials and documentation and interpretation of the structure may be required as conditions of approval for a demolition permit. If the structure or place is found to be significant and the mitigation measures above are insufficient, staff or the concerned group(s) or agency(s) may petition the hearing examiner for a public hear-*

*ing to consider significance of the structure or place and options available to preserve the public interest.*

*2. Based on input received at the public hearing, the hearing examiner may:*

*a. Authorize issuance of a demolition permit; or*

*b. Issue a continuance of the stay for no longer than one year to provide opportunity for acquisition, easement, or other preservation mechanism to be negotiated; or*

*c. Take other action as required by state statutes or administrative code as advised by authorized representatives of the Washington State Department of Archaeology and Historic Preservation.*

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## 6. Action Plan

The following recommendations are prioritized into four categories: ongoing, short term, mid-term, and long term. The table provides the priority for the recommendation, the type of recommendation, relevant goals and policies that support the recommendation, and suggested participants.

The following chapter outlines an action plan for the recommendations outlined in Chapter 5: Recommendations in support of Chapter 4: Goals, Policies, and Proposals. This chapter divides the proposals into ongoing, short term, mid-term, and long term activities over a 15-year period starting in 2023 (2023-2038). The proposals are sequenced in order to help city staff and the HPC prioritize activities and build upon previous work.

- **Ongoing:** these proposals will continue each year and reflect ongoing efforts rather than specific tasks to accomplish.
- **Short term:** between 2023 and 2028. This phase focuses on public education and outreach, code updates, and updating the inventory with survey work from recent years.
- **Mid-term:** between 2029 and 2033. This phase builds on education and outreach and begins additional inventory work and policy updates.
- **Long term:** between 2034 and 2038. This phase continues education, outreach, and inventory work and finalizes policy and program updates.

These are recommendations on priorities and may be adjusted by staff and the HPC as they see fit.

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Ongoing	City Integration - Economic Promotion	Pursue heritage capital grant funds for repair and improvement work on the Carnegie building. Pursue FEMA funding for the seismic retrofit of the building if this work has not already been completed.	Goal 2	HP Policy 2.5	City staff, HPC
Ongoing	City Integration - Economic Promotion	Continue to track Special Valuation usage, qualified rehabilitation expenditure total, building name, address, start/end for 10-year period, and agreement reference number.	Goal 4	HP Policy 4.1	City staff
Ongoing	City Integration - Economic Promotion	Continue to encourage property owners to consider the use of the Special Valuation program.	Goal 4	HP Policy 4.1	City staff, HPC, City Council
Ongoing	City Integration - Economic Promotion	Develop a program/process that highlights historic preservation projects (Goal 2 and 3, Comprehensive Plan 2040). <sup>97</sup>	Goal 4	HP Policy 4.2	City staff, HPC
Ongoing	City Integration - Economic Promotion	Continue to encourage property owners to consider the use of the federal rehabilitation tax credits and their integration with grants and energy incentive rebates in planning for substantial rehabilitation work on their buildings and to consult with DAHP on the potential use of this program.	Goal 4:	HP Policy 4.3	City staff, HPC, City Council
Ongoing	City Integration - Economic Promotion	Expand visitor awareness of Walla Walla's heritage and its historic resources online and promote Walla Walla as a destination for cultural heritage tourists (Goal 3, and 5, Comprehensive Plan 2040). <sup>98</sup>	Goal 5	HP Policy 5.1	City staff, HPC, City Council
Ongoing	City Integration - Planning and Coordination	Preserve and protect identified archaeological resources. Adopt a policy where if new development does not allow for the preservation of archaeological resources in place, they should be documented according to federal, state, and local standards and regulations.	Goal 2	HP Policy 2.1	City staff

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Ongoing	City Integration - Planning and Coordination	Support property owners in developing site stewardship plans to provide specific guidance and recommendations for landowners having archaeological sites on their property. This depends on owner participation.	Goal 2	HP Policy 2.1	City staff, HPC
Ongoing	City Integration - Planning and Coordination	WWRHP listed properties should be included as a layer in the city's interactive GIS map that is available to the public. A hyperlink should be included with each resource allowing downloading of the applicable HPC packet and staff report approved as part of the listing process.	Goal 2, Goal 3	HP Policy 2.2	City staff
Ongoing	City Integration - Planning and Coordination	Convey designation status data to the County assessor. Listing data is not being transmitted for every property to the County assessor, as the property details for some buildings under the assessor property record data have a line for "Historic Property" with "N" (no) recorded for the WWRHP listed properties sampled, including some with special valuation agreements. Others had a "Y" (yes) recorded. Conveying this data to the county will assist in informing real estate sales.	Goal 2, Goal 3	HP Policy 2.2, HP Policy 3.2	City staff
Ongoing	City Integration - Planning and Coordination	Work with the Confederated Tribes of the Umatilla Indian Reservation THPO, DAHP, the Fort Walla Walla Museum and historical societies to develop educational programs around what is archaeology and traditional cultural properties.	Goal 3: Inform Walla Walla residents and provide access to information on historic preservation in the city.	HP Policy 3.1, HP Policy 3.2	City staff, HPC, CTUIR, DAHP, Fort Walla Walla Museum

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Ongoing	Survey and Inventory - City-wide	Prioritize survey and inventory projects that can expand understanding and document the history of underrepresented and historically marginalized communities. Build in oral history components to allow for stories not documented in traditional resources to be identified. Potential ideas include the Chinese in Walla Walla, women's history, LGBTQA+ history, and redlining and restrictive covenants.	Goal 1, Goal 3	HP Policy 1.1, HP Policy 3.1	HPC, City staff
Ongoing	Survey and Inventory - City-wide	Consider partnering with Whitman College, Fort Walla Walla Museum, The Listeners Project: Queremos Escucharte, and others to pursue grant funding for a Latinx survey in the Walla Walla Valley.	Goal 1, Goal 3	HP Policy 1.1, HP Policy 3.1	City staff, HPC, Whitman College, Fort Walla Walla Museum
Short term	City Integration - Economic Promotion	Include a link on the City website to the U.S. National Park Service Technical Preservation Services online guide to help property owners work through energy upgrades to their buildings.	Goal 3	HP Policy 3.2	City staff
Short term	City Integration - Economic Promotion	Refine education materials that outline benefits of historic preservation (Goal 2, Comprehensive Plan 2040).	Goal 3	HP Policy 3.2	City staff, HPC
Short term	City Integration - Land Use and Zoning	Ensure the "HR" designation is recorded within the City's zoning and parcel layers in GIS. Currently, the "HR" designation is not being recorded on the official parcel or zoning record based on a review of the City's zoning and parcel layers in GIS. The "HR" should be recorded and include recording the date for the listing, such as "HR, listed 1/1/2022." See 5.3.3.	Goal 2	HP Policy 2.2 Broaden and clarify the role of historic preservation within the City's decision making.	City staff
Short term	City Integration - Land Use and Zoning	Review and complete land use and zoning language changes in WVMC (see 5.3.3. Land Use and Zoning in Chapter 5. Recommendations).	Goal 2	HP Policy 2.2	City staff



PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Short term	City Integration - Planning and Coordination	Based on previous CTUIR suggestions, work with the CTUIR's Cultural Resource Committee to revise and refine the following code example language based on the City of Olympia's OMC 18.12.120 through 140 and published DAHP guidance to address the protection and management of archaeological resources and provide clearer guidance around process and best practices. Adopt the language once revisions are complete.	Goal 2	HP Policy 2.1	City staff, CTUIR, City Council
Short term	City Integration - Planning and Coordination	Develop policies and procedures for ground disturbing public and private work within the city requiring a permit to identify and address potential impacts to archaeological resources including a standard inadvertent discovery plan that can be included with permits involving ground disturbing work.	Goal 2	HP Policy 2.1	City staff, City Council, DAHP, CTUIR
Short term	City Integration - Planning and Coordination	Adopt the Historic Preservation Plan as an element of the city's comprehensive plan.	Goal 2	HP Policy 2.2	City staff, HPC, City Council
Short term	City Integration - Planning and Coordination	Update capital repair plans for NRHP eligible municipal buildings. As part of planned repairs, prioritize the retention of original materials.	Goal 2	HP Policy 2.5	City staff, HPC, City Council
Short term	City Integration - Planning and Coordination	The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Cultural Resources Protection Program has expressed interest in sharing a First Foods presentation at a City Council meeting. Coordinate with City Council to invite them to share this presentation.	Goal 3	HP Policy 3.1	City staff, HPC, City Council, CTUIR
Short term	Programmatic - HPC & Bylaws	Develop a matrix identifying what is reviewed by City staff or the HPC based on the type of work involved and the process steps involved in consultation with City staff. The intent is to both clarify roles and responsibilities for staff and the HPC and to make the process more accessible for building owners.	Goal 1, Goal 2	HP Policy 1.3, HP Policy 2.2	City staff, HPC

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Short term	Programmatic - HPC & Bylaws	Include the full text of the Secretary of the Interior's Standards for Rehabilitation in the Bylaws for Commissioner use during design review and public use in understanding the ten standards that will be used in evaluating the proposed alterations.	Goal 1, Goal 4	HP Policy 1.3, HP Policy 4.3	City staff
Short term	Programmatic - HPC & Bylaws	Implement a series of language updates to the Bylaws so that they function as rules and regulations supplementing but not duplicating the Historic Preservation Ordinance. See Appendix F for specific language changes.	Goal 1	HP Policy 1.3	City staff, HPC
Short term	Programmatic - HPC & Bylaws	Change WWMC 20.42 Violations and Enforcement to include WWMC 2.27.050. Current language under WWMC 2.27.050(D)(2) states that "violation of this rule shall be grounds for the commission to review the property for removal from the register."	Goal 2	HP Policy 2.2	City staff, HPC, City Council
Short term	Programmatic - Local Registers	Implement a process to record the meeting date that a property's listing took place to reference the vote and any decision elements, and to package these elements as a single PDF for linking in the above referenced GIS map for each WWRHP property.	Goal 1	HP Policy 1.3	City staff
Short term	Programmatic - Local Registers	Update the WWRHP nomination form to include a signature line for owner consent to listing, as the nomination form does not have a line stating that by signing, they consent to listing and identify them as the fee simple owner.	Goal 1	HP Policy 1.3	City staff

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Short term	Programmatic - Local Registers	Listing data is not being transmitted for every property to the County assessor, as the property details for some buildings under the assessor property record data have a line for "Historic Property" with "N" (no) recorded for the WWRHP listed properties sampled, including some with special valuation agreements. Others had a "Y" (yes) recorded. Conveying this data to the county will assist in informing real estate sales. Coordinate with the Walla Walla County assessor to ensure that historic listing data is transmitted to their records when a property is listed to the WWRHP and/or a special valuation agreement is recorded. This should also include a statement within the deed that the property is designated to the Walla Walla Register of Historic Places, the date and number of designation, and that this statement gets transferred and noted to a new property owner.	Goal 1	HP Policy 1.3	City staff
Short term	Programmatic - Local Registers	Confirm the three properties identified in GIS under sub-type 892 as WWRHP listed that do not show up in the City's 2021 Updated Local Register list.	Goal 1	HP Policy 1.3	City staff
Short term	Programmatic - Ordinance	Implement a series of language updates to WVMC 2.27 Historic Preservation Ordinance. See Appendix E for specific language changes.	Goal 2	HP Policy 2.2	City staff, HPC, City Council

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Short term	Survey and Inventory - City-wide	Prepare a URM survey data update. The intent is to improve the City's dataset around URMs to inform planning and property owner support in retrofitting buildings. The 2018 Washington Unreinforced Masonry Building Inventory identified 137 known and suspected URMs within the city and included the recommendation for State government support to update information on historic status (listed or eligible), vacancy and underutilization, and Building and Site Characteristics data. Part of the coordination with DAHP and the State Commerce Department should be to secure grant funding to collect this additional data, per the 2018 URM study recommendations.	Goal 1, Goal 2	HP Policy 1.1, HP Policy 2.2	City staff, HPC, City Council, Consultant
Short term	Survey and Inventory - City-wide	Reach out to the CTUIR to determine their interest in partnering to prepare a traditional use study to identify and document traditional land use patterns within the city limits of Walla Walla. If possible, continue this work into the built environment to identify extant historic resources with tribal connections.	Goal 3	HP Policy 3.1	City Council, City staff, HPC, CTUIR
Mid-term	City Integration - Economic Promotion	Establish a city historic preservation and seismic retrofitting grant program.	Goal 2	HP Policy 2.2	City staff, HPC, City Council
Mid-term	City Integration - Economic Promotion	Hire a specialist to conduct workshops with interested property owners to assess and develop treatment approaches for the repair and weatherization of historic wood windows to assist property owners in planning for this work.	Goal 2	HP Policy 2.3	City staff, HPC, Consultant
Mid-term	City Integration - Economic Promotion	Pull the case study examples from Appendix E of the 2004 Downtown Walla Walla Master Plan for renovation and adaptive reuse and make available on the HPC website as reference material.	Goal 4	HP Policy 4.2	City staff



PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Mid-term	City Integration - Planning and Coordination	Work with the Confederated Tribes of the Umatilla Indian Reservation THPO and DAHP to identify areas of high likelihood for archaeological resources and traditional cultural properties within the city and develop policies to avoid and protect these resources so that they are not damaged. This information can help shape policies and actions based on risk level for different areas to focus resources on monitoring and pre-construction surveys to areas with a high risk.	Goal 2	HP Policy 2.1	City staff, CTUIR, DAHP, Consultant
Mid-term	City Integration - Planning and Coordination	Work with the Confederated Tribes of the Umatilla Indian Reservation THPO and DAHP to provide training for City public works staff and field crews on how to recognize archaeological deposits in the field, and the proper policies and procedures to follow when deposits are identified.	Goal 2	HP Policy 2.1	City staff, CTUIR, DAHP
Mid-term	City Integration - Planning and Coordination	Work with the Confederated Tribes of the Umatilla Indian Reservation to develop a memorandum of understanding (MOU) addressing cultural resources protection. CTUIR Cultural Resources Protection Program staff recommend starting with a meeting between technical staff and the HPC, followed by a meeting between the HPC and CTUIR's Cultural Resource Committee. The Cultural Resource Committee will then make a recommendation to the Tribes' Board of Trustees. And the HPC should make their own recommendation to Council to pursue development of the MOU.	Goal 2	HP Policy 2.1	City staff, CTUIR, City Council, HPC, Consultant
Mid-term	City Integration - Planning and Coordination	Adopt a standard inadvertent discovery plan (IDP) for use on projects involving ground disturbance where soil is to be moved or removed and make the plan available to the public on the City's website under "Building Permitting."	Goal 2	HP Policy 2.1	City staff, Consultant, City Council

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Mid-term	Programmatic - HPC & Bylaws	Reduce the language in Section VI: National Register Review by retaining the first four paragraphs, and then revising the rules and procedures language to convey that the review will be included on the agenda and conducted as part of a regularly schedule Commission meeting using documentation provided by DAHP to determine if the Commission agrees that the nomination is worthy of listing and worthy of moving forward in the process.	Goal 1	HP Policy 1.3	City staff, City Council
Mid-term	Programmatic - HPC & Bylaws	Note that for reference, the Commission does not determine a category of historic property, is level of significance, or if the nomination meets NPS standards, that will have been done by DAHP.	Goal 1	HP Policy 1.3	City staff, City Council
Mid-term	Programmatic - HPC & Bylaws	Undertake a process to update WWMC 2.27 to address demolition by neglect, economic hardship, conditional approval to include mitigation, and criteria utilized by the HPC in considering a waiver of the certificate of appropriateness for demolition of a property. These changes should be made to WWMC 2.27 and not the Bylaws to have the language in one location for the public and in the established municipal code.	Goal 2	HP Policy 2.3.	City staff, City Council
Mid-term	Programmatic - HPC & Bylaws	Update the City's "Residential/Commercial Demolition Application" to include under the Required Documents section a check box for whether the property is listed to the WWRHP and provide information on where the applicant can find this information.	Goal 2	HP Policy 2.3	City staff, City Council

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Mid-term	Programmatic - HPC & Bylaws	Require a pre-application conference with City planning staff prior to Commission Review of proposed demolition of historic structures to outline financial incentives and/or code relief available for historic properties and instruct applicants on the level of detail required for the demolition permit application.	Goal 2	HP Policy 2.3	City staff
Mid-term	Programmatic - HPC & Bylaws	Extend the review period under WWMC 2.27.060(C)(3) to 60 days to match the time-period under WWMC 20.146.040(B)(1).	Goal 2	HP Policy 2.3	City staff, City Council
Mid-term	Programmatic - HPC & Bylaws	Change language in WWMC 2.27.050(D) to address demolition by neglect and include a requirement for affirmative or minimum maintenance standards to address structural defects or hazards; defective or inadequate weather protection; or defects increasing the hazards of fire or accidents.	Goal 2	HP Policy 2.3	City staff, City Council
Mid-term	Programmatic - HPC & Bylaws	Consider establishing a community preservation fund, facade grant program, and/or minimum maintenance revolving fund that could be paid into as part of mitigation for demolition and/or funded through the cost of demolition permits.	Goal 2	HP Policy 2.3	City staff, City Council, HPC
Mid-term	Programmatic - HPC & Bylaws	Develop economic hardship decision criteria that the HPC must consider when reviewing a request for a waiver of a certificate of appropriateness for demolition. The type of evidence required to demonstrate economic hardship must be spelled out in the preservation ordinance.	Goal 2	HP Policy 2.3	City staff, City Council, Consultant
Mid-term	Programmatic - HPC & Bylaws	Develop language requiring that historic structures that cannot be preserved are deconstructed to preserve and reuse historically significant architectural features as part of required mitigation.	Goal 2	HP Policy 2.3	City staff, City Council, Consultant

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Mid-term	Programmatic - HPC & Bylaws	Code amendment to prohibit demolition of structures for construction of parking lots (Goal 1, Comprehensive Plan 2040).	Goal 2	HP Policy 2.4	City staff, City Council
Mid-term	Survey and Inventory - City-wide	Develop a list of municipal properties that are 50 years or older to lead by example and follow through with designations for any resources that are eligible. Conduct a reconnaissance-level survey of these properties to determine which might be NRHP eligible. Pursue NRHP listing for those properties that are eligible.	Goal 1, Goal 2	HP Policy 1.1	City staff, City Council, Consultant, HPC
Mid-term	Survey and Inventory - City-wide	Connect with Whitman College art history classes in advance of planned historic resource work to determine if student research projects align with the survey area. This does not replace the work of a consultant and is not meant to be a class in survey and inventory, but to provide an opportunity for students to begin research that can inform survey work and foster a relationship between the college and the HPC.	Goal 1, Goal 3	HP Policy 1.1, HP Policy 3.2	City staff, HPC, Whitman College
Mid-term	Survey and Inventory - City-wide	Conduct a city-wide multiple family dwelling RLS and historic context. The intent is to determine if there is potential thematic eligibility for NRHP and WWRHP listing to support HTC and SPV use for these income producing properties; to confirm and update URM survey data; and to identify the seismic retrofit need for property owner support.	Goal 1	HP Policy 1.1	City staff, HPC, Consultant
Long term	City Integration - Economic Promotion	Support and help sponsor any efforts to pursue National Heritage Area status for the Walla Walla Valley in coordination with other stakeholders (e.g., CTUIR, Fort Walla Walla Museum, Frenchtown).	Goal 5, Goal 3	HP Policy 5.2, HP Policy 3.2	City staff, HPC, CTUIR, City Council, Fort Walla Walla Museum, Frenchtown Historic Site



PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Long term	Programmatic - Local Registers	Establish preservation districts for neighborhoods, work with residents and property owners (Goal 4, Comprehensive Plan 2040). <sup>87</sup> This could start with neighborhoods that have surveyed/ inventoried, including Green Park and Germantown.	Goal 1	HP Policy 1.2	City staff, City Council, Consultant, HPC
Long term	Programmatic - Local Registers	Develop design standards for identified neighborhoods to manage change and density increases through compatible middle-housing development prioritized to vacant lot and non-contributing building replacement, that increases housing, places housing in proximity to existing infrastructure, and contributes long-term to the neighborhood character and sense of place (Goal 4, Comprehensive Plan 2040). <sup>88</sup>	Goal 1	HP Policy 1.2	City staff, City Council, Consultant, HPC
Long term	Survey and Inventory - City-wide	Conduct an ILS of City parks that are 50 years or older to complete new and update the few existing inventory forms. The intent of this survey is to provide planning data to support the ongoing management of these resources as well as inform eligibility for potential grants to support repairs and improvements.	Goal 1, Goal 2	HP Policy 1.1, HP Policy 2.5	City staff, Consultant, HPC, DAHP
Long term	Survey and Inventory - City-wide	Work with the City's Parks and Recreation Department and Walla Walla Historic Cemeteries to determine if there is interest in surveying and evaluating the Mountain View Cemetery (established in the 1860s) for NRHP listing. <sup>93</sup> If there is, pursue this documentation.	Goal 1, Goal 2.	HP Policy 1.1, HP Policy 2.5	City staff, Consultant, HPC
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [1] Langford's Addition RLS and historic context.	Goal 1	HP Policy 1.1	City staff, Consultant, HPC, DAHP
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [2] Green's First Addition RLS.	Goal 1	HP Policy 1.1	City staff, Consultant, HPC, DAHP
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [3] Roberts Addition RLS and historic context.	Goal 1	HP Policy 1.1	City staff, Consultant, HPC, DAHP

PRIORITY	RECOMMENDATION TYPE	RECOMMENDATION	RELATED HP GOAL	RELATED HP POLICY	POSSIBLE PARTICIPANTS
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [4] Cain's Addition RLS and historic context.	Goal 1: Identify, evaluate, and nominate cultural resources.	HP Policy 1.1 Continue seeking grant opportunities to conduct cultural resource surveys.	City staff, Consultant, HPC, DAHP
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [5] Reed's Addition RLS and historic context.	Goal 1: Identify, evaluate, and nominate cultural resources.	HP Policy 1.1 Continue seeking grant opportunities to conduct cultural resource surveys.	City staff, Consultant, HPC, DAHP
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [6] South Park Addition RLS.	Goal 1	HP Policy 1.1	City staff, Consultant, HPC, DAHP
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [7] Babcock's Addition RLS.	Goal 1	HP Policy 1.1	City staff, Consultant, HPC, DAHP
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [8] RLS, Bryant's Addition, Park Street Garden, and Bryant's Acres Tracts area encompassing multiple plats with a different pattern in street layout from surrounding plats.	Goal 1	HP Policy 1.1	City staff, Consultant, HPC, DAHP
Long term	Survey and Inventory - Neighborhoods	Survey and Inventory: [9] RLS, Isaac's Addition, Isaac's 2nd Addition, Isaacs 3rd Addition, Isaacs Park, College Addition.	Goal 1	HP Policy 1.1	City staff, Consultant, HPC, DAHP

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## 8. Appendices

### 8.1. COMMUNITY SURVEY

The following community survey was shared by the City of Walla Walla to solicit feedback on the historic preservation program. The text that follows is what was included in the community survey that was posted.

## Walla Walla Historic Preservation

### Community Survey

#### Introduction

The City of Walla Walla received a Certified Local Government (CLG) grant from the Department of Archaeology and Historic Preservation (DAHP) to prepare a historic preservation plan to guide historic preservation efforts in the city for the next 10 years. This survey will help the consultants, Northwest Vernacular, gather data about Walla Walla's history and historic places that matter to the community.

Historic preservation is about ensuring the heritage and historic places that enrich our lives remain for future generations. Preserving historic places (buildings, structures, objects, sites) highlights what's already valued in Walla Walla by both residents and visitors.

A historic preservation plan is the result of a process through which a community establishes its vision, goals, and priorities for the preservation of its historic resources. A historic preservation plan is a city planning document that will guide the city's historic preservation program and provide a roadmap to achieving its goals.

#### Questions

1. Please tell us about yourself and your connection to Walla Walla and its heritage. Please choose all responses that describe you:
  - a. Do you live in Walla Walla? y/n
  - b. Are you a business owner? y/n
  - c. Are you an educator or student? y/n
  - d. Do you have a general interest in history or historic preservation? y/n
  - e. Do you utilize businesses in downtown Walla Walla? y/n
  - f. Do you live in a historic property? y/n
  - g. Do you own a historic property? y/n
  - h. Do you deal with history or historic preservation in your profession? y/n
  - i. Do you work in real estate or the building trades? y/n
  - •
2. What place(s) do you think help define Walla Walla and are important to the community?
  - a. Downtown Walla Walla (Main Street area)
  - b. Parks

- c. Residential neighborhoods
- d. Civic buildings
- e. Churches
- f. Marcus Whitman Hotel
- g. Fort Walla Walla and Museum
- h. Whitman Mission National Historic Site
- i. Schools
- j. Other: [with a write-in comment box]

3. On a scale of 1-10, how connected do you feel to Walla Walla and the community?

4. What helps you feel connected to Walla Walla? Please check all that apply:

- a. Volunteering in the community
- b. Working in the community
- c. Shopping in the community
- d. Community events
- e. Other: [with a write-in comment box]

5. On a scale of 1-10, how beneficial do you feel historic preservation is to:

- a. Community Character
- b. Local/Heritage Tourism
- c. Economic Development
- d. Sustainability

6. What are the best ways to encourage historic preservation in Walla Walla?

- a. Advocacy
- b. Education
- c. Financial incentives
- d. City planning
- e. Design review
- f. Awards to successful projects
- g. Other: [with a write-in comment box]

7. On a scale of 1-10, do you worry about historic places being demolished or significantly altered? And if so, which places: [with a write-in comment box]

• •



8. Has there been a successful historic preservation project in Walla Walla that you have appreciated? Y/N
  - a. If yes, please describe the project [with a write-in comment box]
9. Do you think the City does enough to support and encourage historic preservation in Walla Walla?
  - a. Yes
  - b. Unsure
  - c. No
10. How could the City improve its historic preservation program?
  - a. Open comment [with a write-in comment box]

### For Historic Property Owners ONLY

1. Do you own a historic property? Y/N
  - a. If yes, then.... On to b below. **If no, skip entire section and end survey**
  - b. Is your property residential or commercial?
    - i. Residential
    - ii. Commercial
  - c. Is your property a designated historic property (individually listed or contributing in a historic district in either the National Register of Historic Places or the Walla Walla Register of Historic Places)?<sup>101</sup>
    - i. Yes, my property is listed in the National Register of Historic Places only
    - ii. Yes, my property is listed in the Walla Walla Register of Historic Places
    - iii. No
    - iv. I don't know
  - d. Have you ever been through the certificate of appropriateness process with the Walla Walla Historic Preservation Commission as an owner or applicant (e.g., architect, contractor)?
    - i. Yes
    - ii. No

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<sup>101</sup> If survey taker answered, "Yes, my property is listed in the National Register of Historic Places only," they skipped to question 1.h. If they answered, "Yes, my property is listed in the Walla Walla Register of Historic Places," then they proceeded to question 1.d. If they answered, "No" or "I don't know," the survey ended.

- If yes, then....

e. Was the application process easy to understand?

- i. Yes
- ii. No

f. Did you understand the design review criteria and how the Historic Preservation Commission came to their decision?

- i. Yes
- ii. No

g. Are there changes to the process or application that you recommend?

- i. Yes [add comment if yes]
- ii. No

If yes to c, then...

h. Have you utilized any of the following financial incentives? Please check all that apply:

- i. Federal historic tax credits
- ii. State special valuation program
- iii. No

## 8.2. COMMUNITY SURVEY RESULTS

The community survey was first publicized on January 31, 2022. The City's Support Services Department promoted the survey in the following ways:

- · Posted news story on City website
- · Emailed notification to the News category (640 subscribers) on the City website
- · Emailed news release to media mailing list (29 recipients)
- · Posted on City Facebook page (pinned post to the top of the page) (8.9K followers)
- · Posted on City Nextdoor account (4,856 followers)
- · Posted on City Twitter account (673 followers)
- · Posted on City Instagram account (1,504 followers)
- · Included a mention in the City's monthly e-newsletter (11,454 subscribers) on 2/1
- · The Union-Bulletin published a story on the survey on February 2, 2022, and posted on the Union-Bulletin Facebook page. The City also included a mention in the Friday Feed (internal City newsletter) on 2/4.

After the initial publication, the city re-publicized the survey on February 23, 2022:

- · Posted news story on City website
- · Emailed notification to the News category (640 subscribers) on the City website
- · Posted on City Facebook page
- · Posted on City Nextdoor account
- · Posted on City Twitter account

Before closing the survey, it was included a mention in the Friday Feed, an internal City newsletter. The survey was closed at 5pm on February 25, 2022. The survey received 494 responses. In summary:

- · 88% of respondents lived in Walla Walla
- · 18% of respondents were business owners
- · 21% of respondents were educators or students
- · 96% of respondents had a general interest in history and historic preservation
- · 95% of respondents frequent businesses downtown
- · 21% of respondents live in a historic property
- · 18% of respondents deal with history or historic preservation in their profession
- · 6% of respondents work in real estate or the building trades

Volunteering, living, and working in the community helped respondents feel the most connected to the community.

53% of respondents rated the benefit of historic preservation to community character at a 10 on a scale of 1–10; 42% rated it between 7 and 9; 4% rated it between 4 and 6; and less than 1% rated it between 1 and 3.

49% of respondents rated the benefit of historic preservation to heritage tourism at a 10 on a scale of 1–10; 43% rated it between 7 and 9; 7% rated it between 4 and 6; and less than 1% rated it between 1 and 3.

34% of respondents rated the benefit of historic preservation to economic development at a 10 on a scale of 1–10; 52% rated it between 7 and 9; 11% rated it between 4 and 6; and 3% rated it between 1 and 3.

31% of respondents rated the benefit of historic preservation to sustainability at a 10 on a scale of 1–10; 52% rated it between 7 and 9; 15% rated it between 4 and 6; and 3% rated it between 1 and 3.

Nine residential property owners with locally listed historic properties (in the WWRHP) completed the survey. Of those 9, only two had completed the certificate of appropriateness process with the HPC. Both indicated the process was easy to understand and did not recommend any changes. They also utilized the State Special Tax Valuation program.

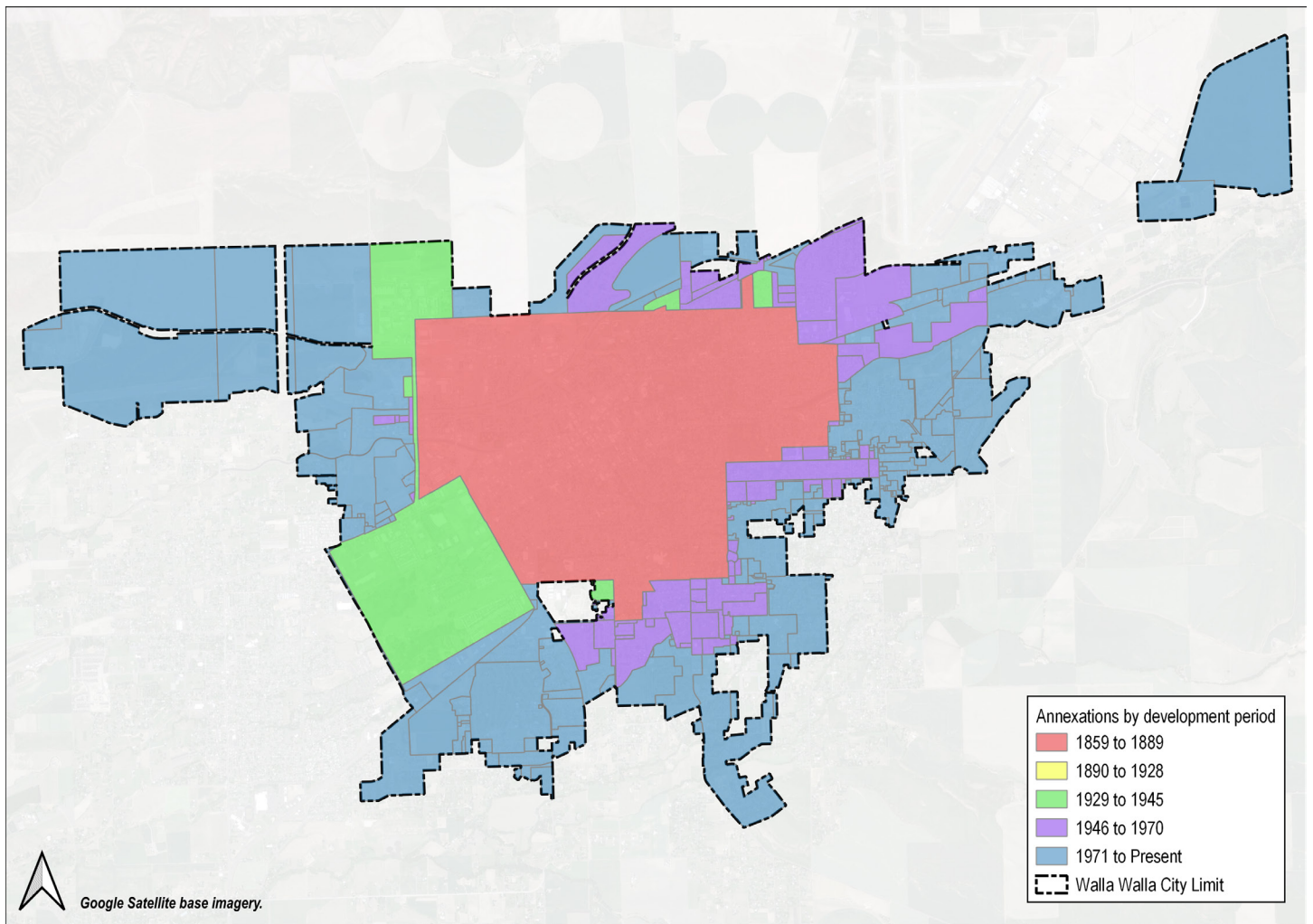
Three commercial property owners with historic properties (in WWRHP or NRHP) completed the survey. Only two (those listed in the WWRHP) had completed the certificate of appropriateness process with the HPC. Both indicated the process was easy to understand and they utilized the State Special Tax Valuation program. The only recommendation for improvement to the COA process was to simplify the application if possible.

Only 17% of respondents believe the City of Walla Walla is doing enough to support and encourage historic preservation in Walla Walla. Common responses included a desire for more public education and outreach and increased incentives and assistance for historic properties to keep them in active use and well maintained. There were mixed responses on how to tackle more inclusive history, with some respondents concerned about a need to expand the narrative around Walla Walla's history (i.e., more inclusivity of Tribal history and underrepresented communities) while others expressed concern about removing statues and rewriting history.

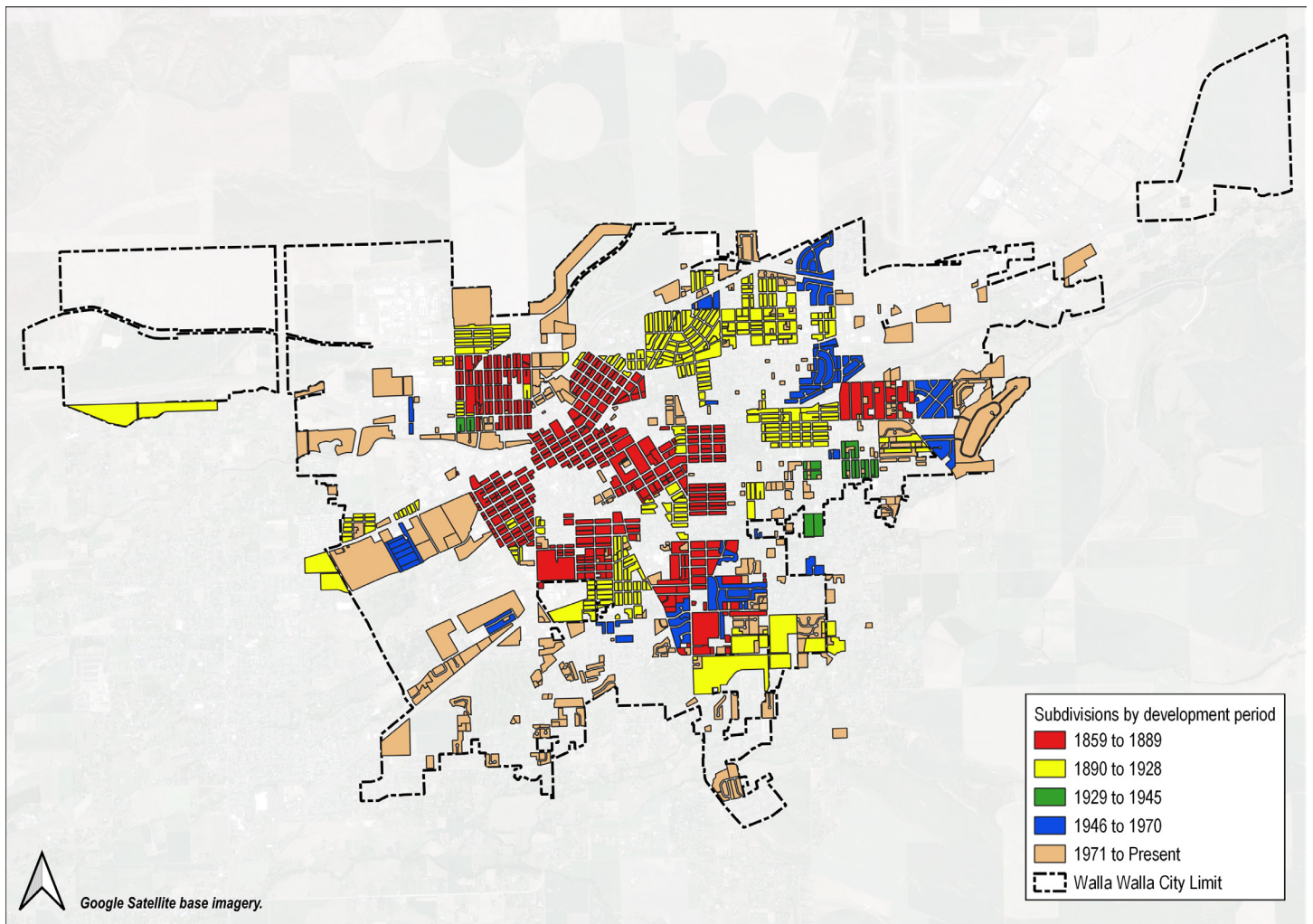


### 8.3. ADDITIONAL MAPS

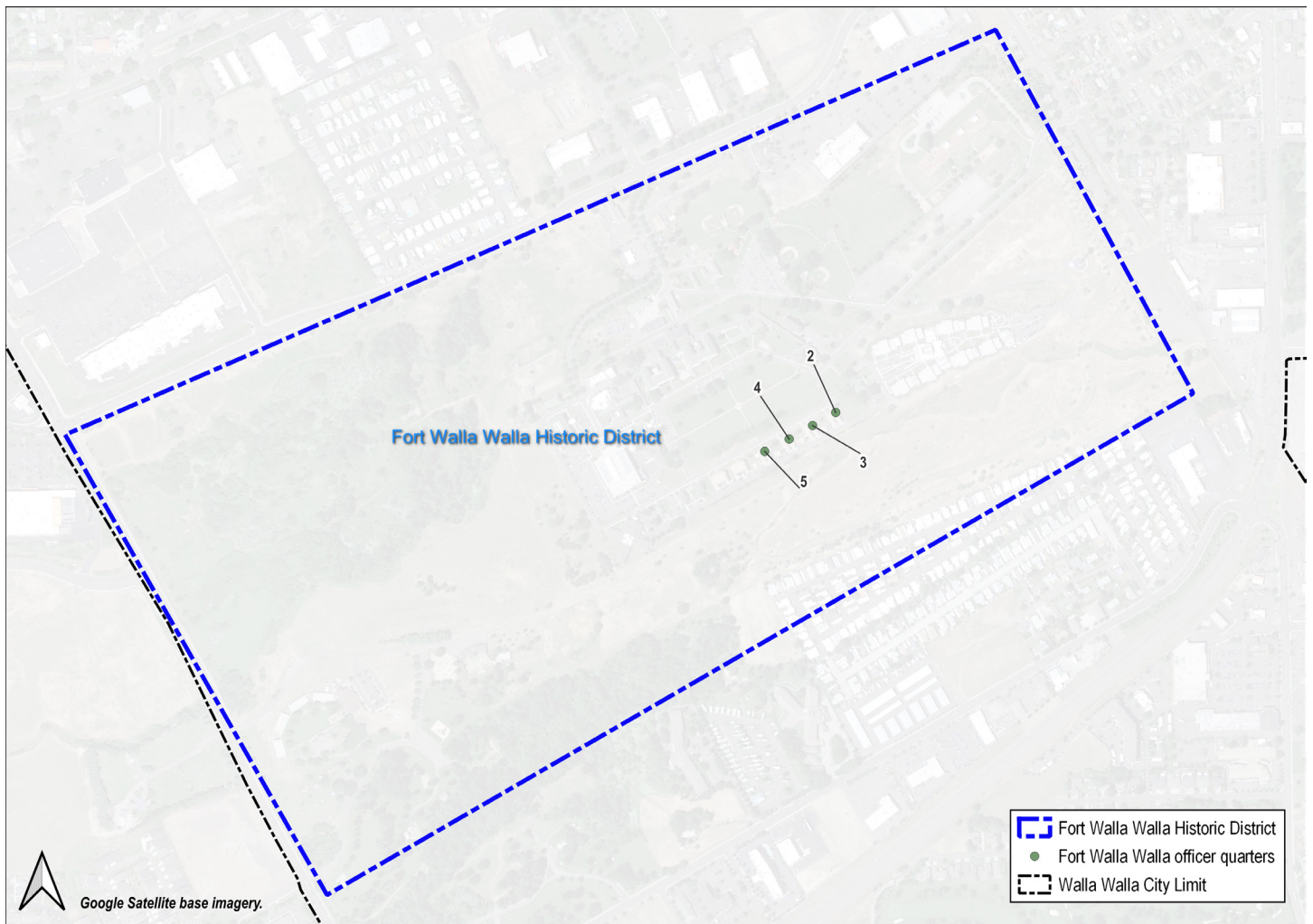
The following maps illustrate the city's historic development periods, subdivision establishment, locations of designated historic properties, and survey locations.



Map 1. Annexations by development period.

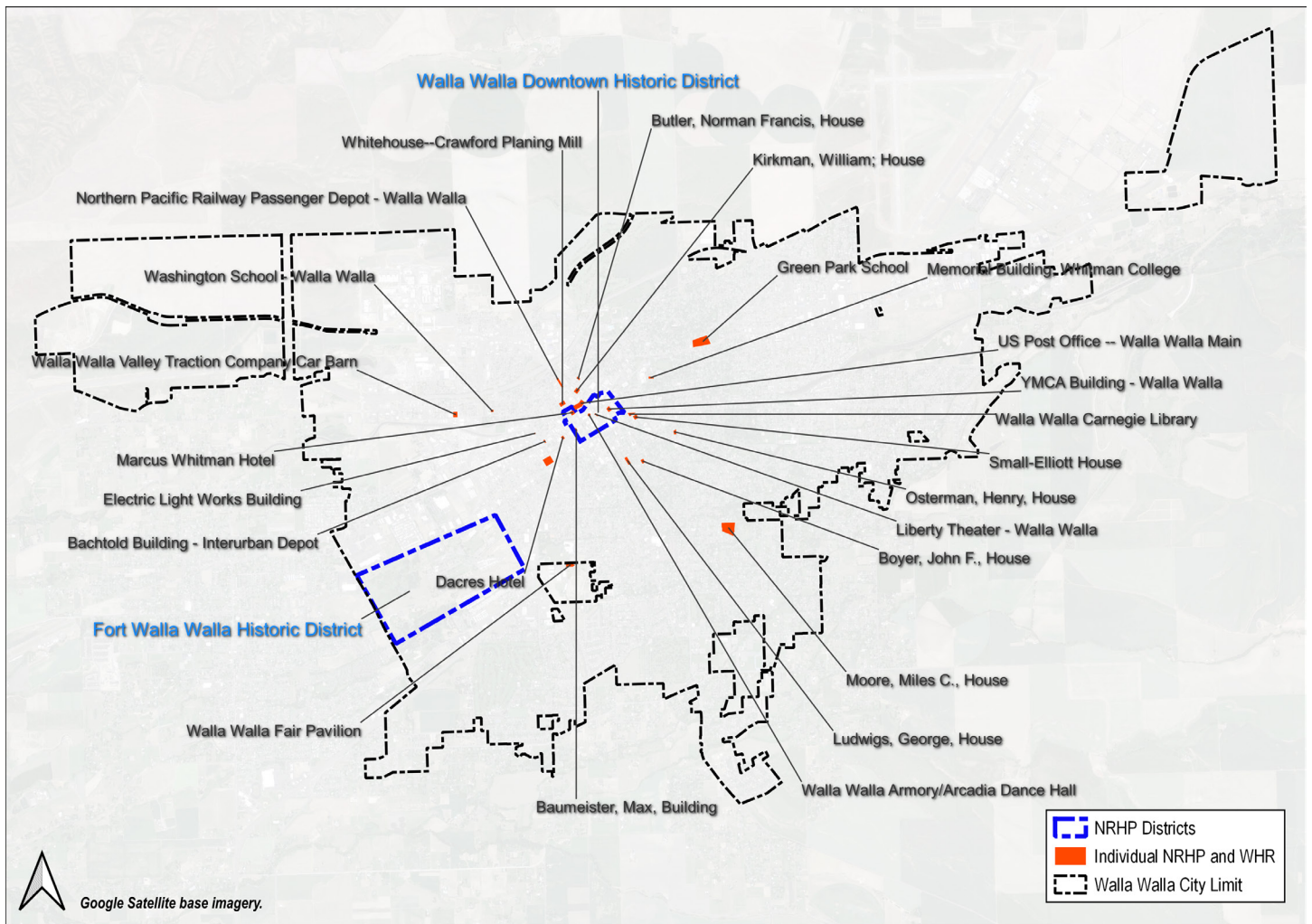


Map 2. Subdivisions by development period.

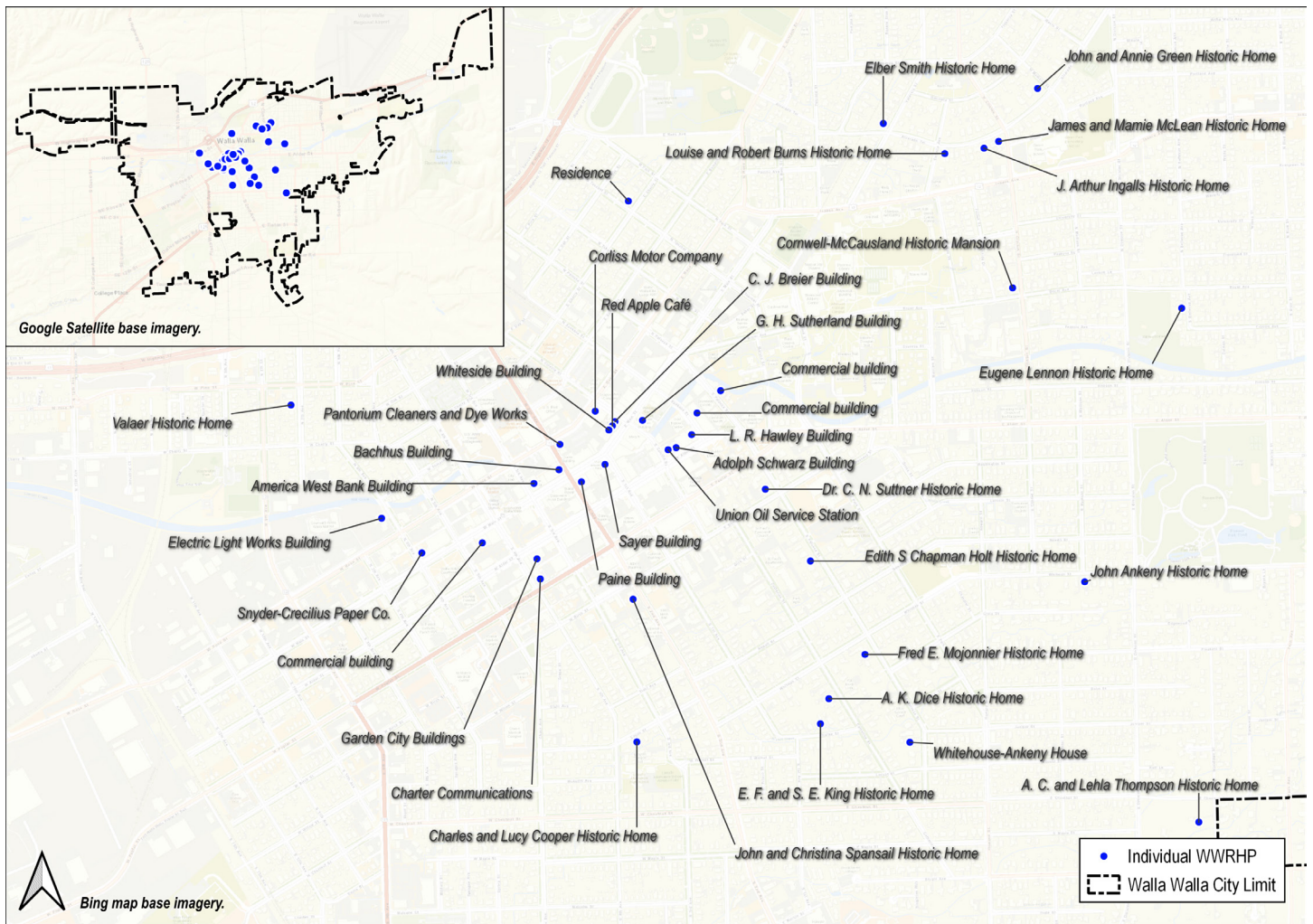


Map 3. Fort Walla Historic District.





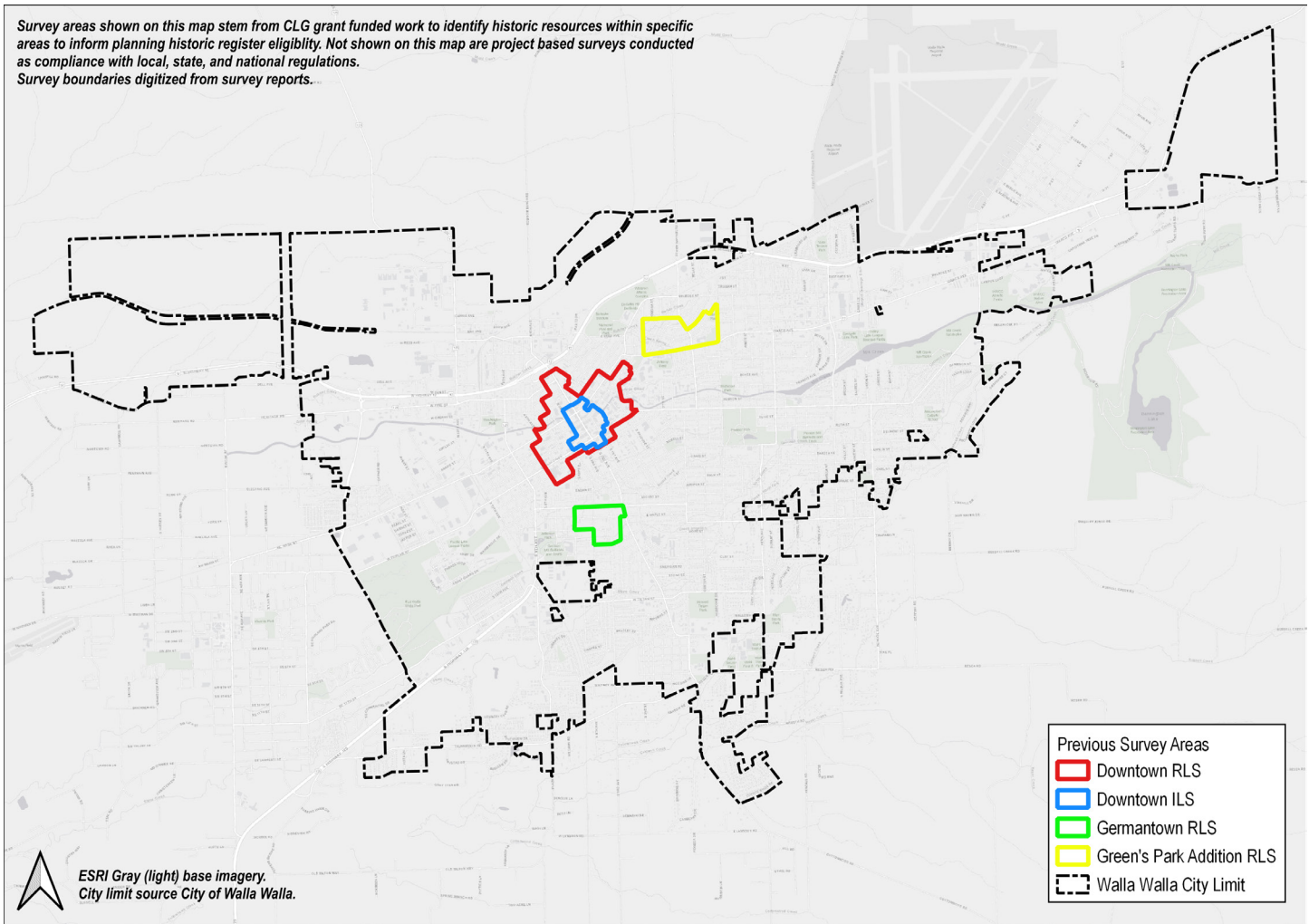
Map 4. National Register and Washington Heritage Register properties



Map 5. Walla Walla Register properties.

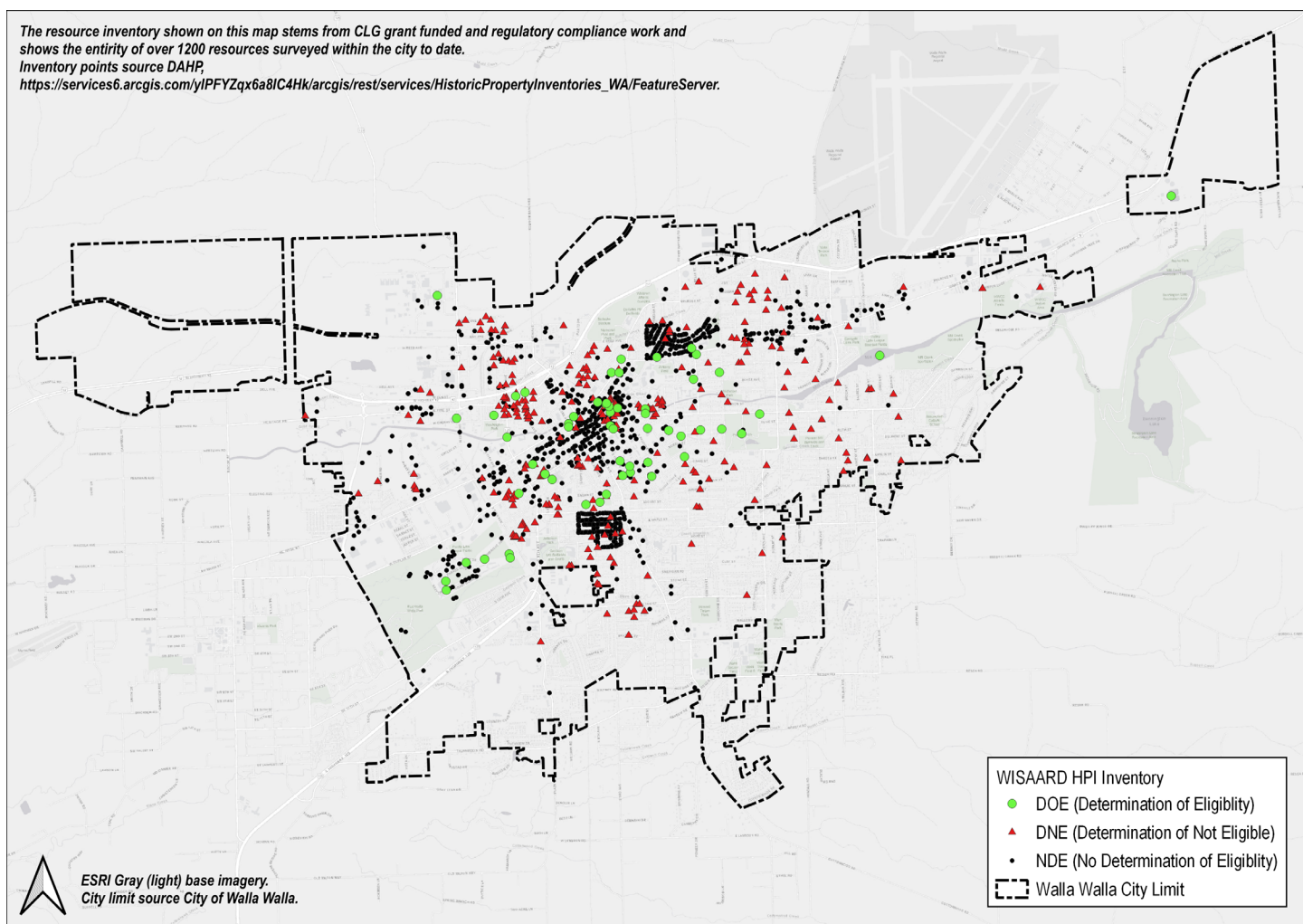


Survey areas shown on this map stem from CLG grant funded work to identify historic resources within specific areas to inform planning historic register eligibility. Not shown on this map are project based surveys conducted as compliance with local, state, and national regulations. Survey boundaries digitized from survey reports...



Map 6. Previous survey areas.

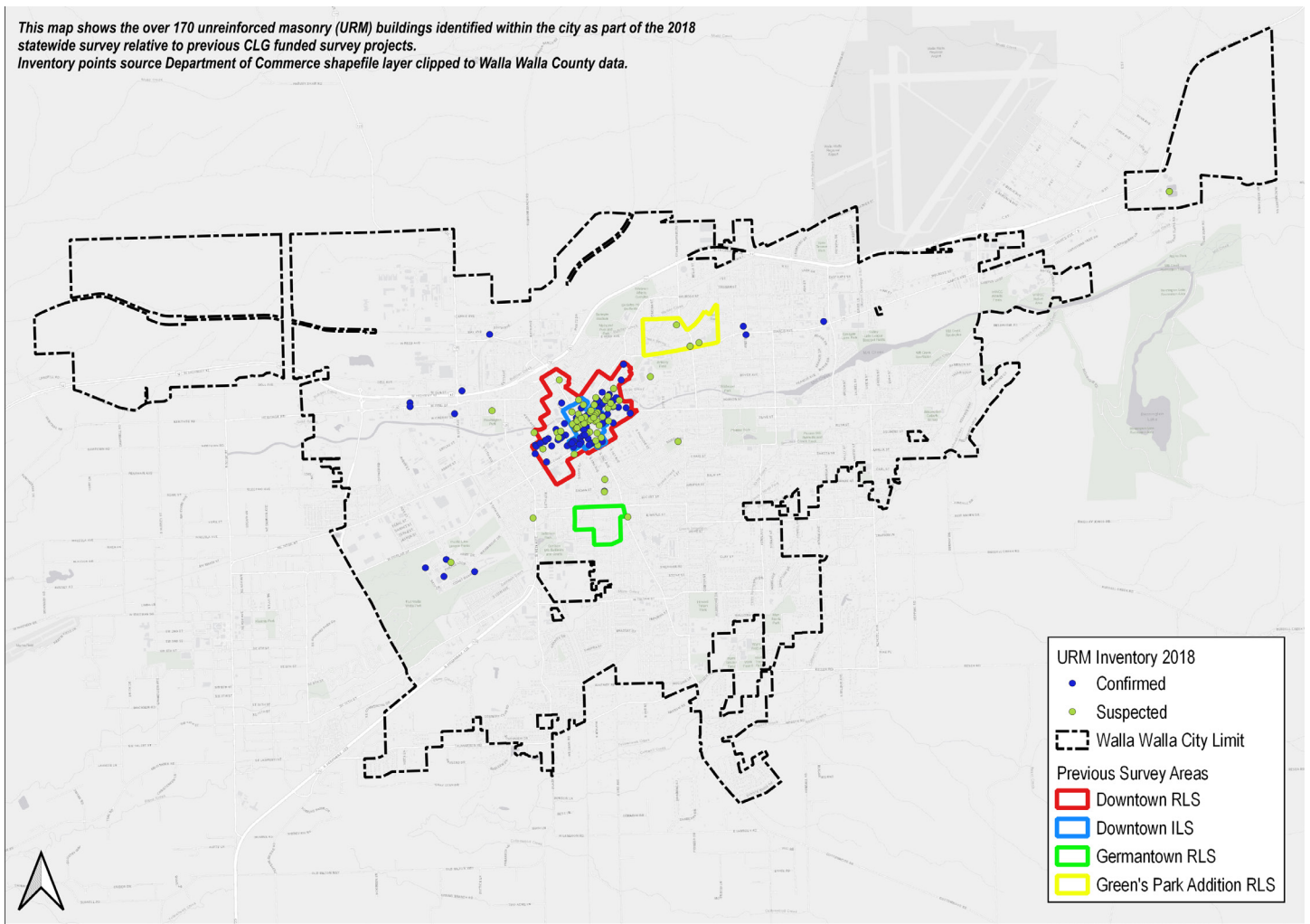
The resource inventory shown on this map stems from CLG grant funded and regulatory compliance work and shows the entirety of over 1200 resources surveyed within the city to date.  
Inventory points source DAHP.  
[https://services6.arcgis.com/yIPFYZqx6a8IC4Hk/arcgis/rest/services/HistoricPropertyInventories\\_WA/FeatureServer](https://services6.arcgis.com/yIPFYZqx6a8IC4Hk/arcgis/rest/services/HistoricPropertyInventories_WA/FeatureServer).



Map 7. HPI form locations.

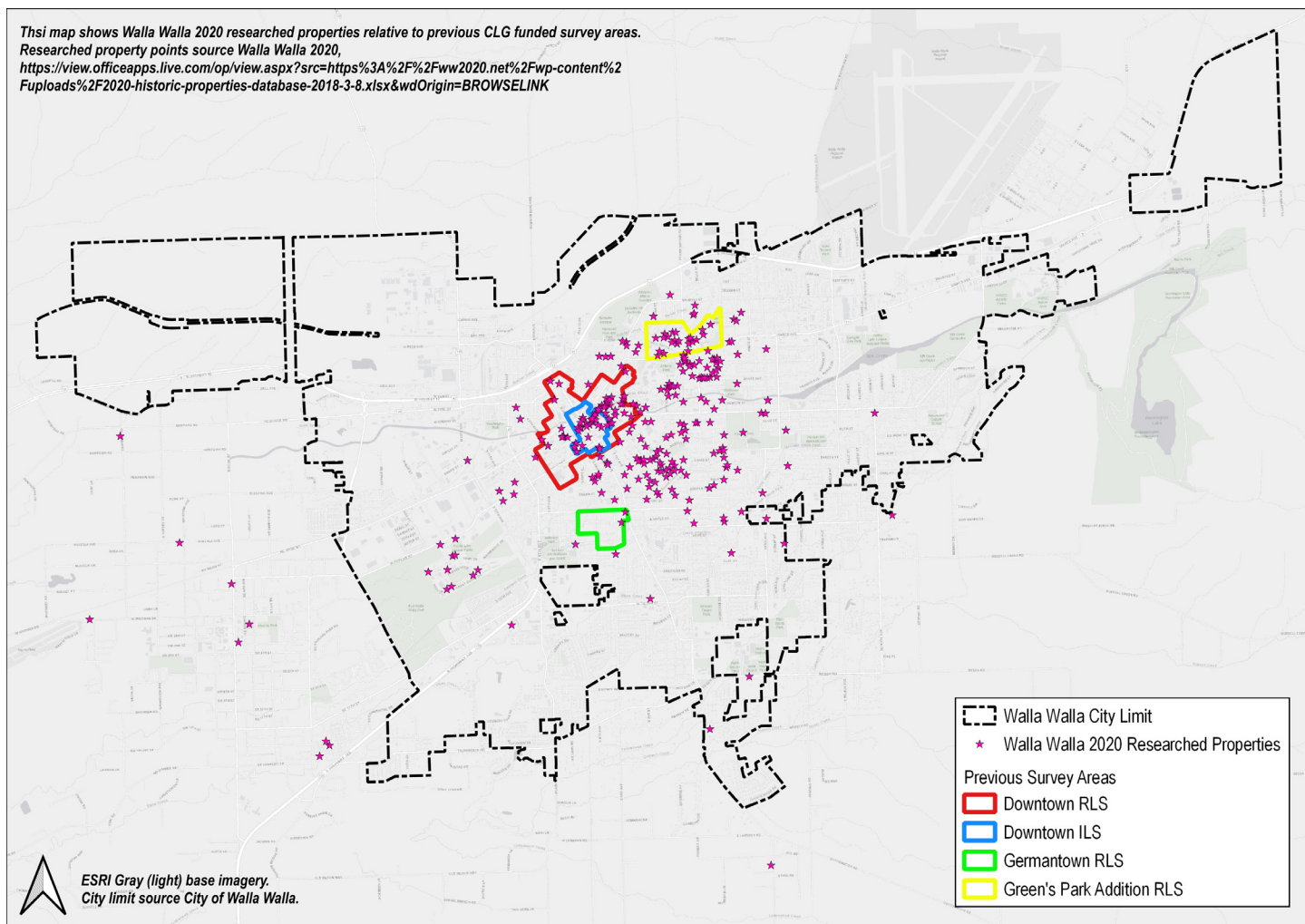


This map shows the over 170 unreinforced masonry (URM) buildings identified within the city as part of the 2018 statewide survey relative to previous CLG funded survey projects. Inventory points source Department of Commerce shapefile layer clipped to Walla Walla County data.

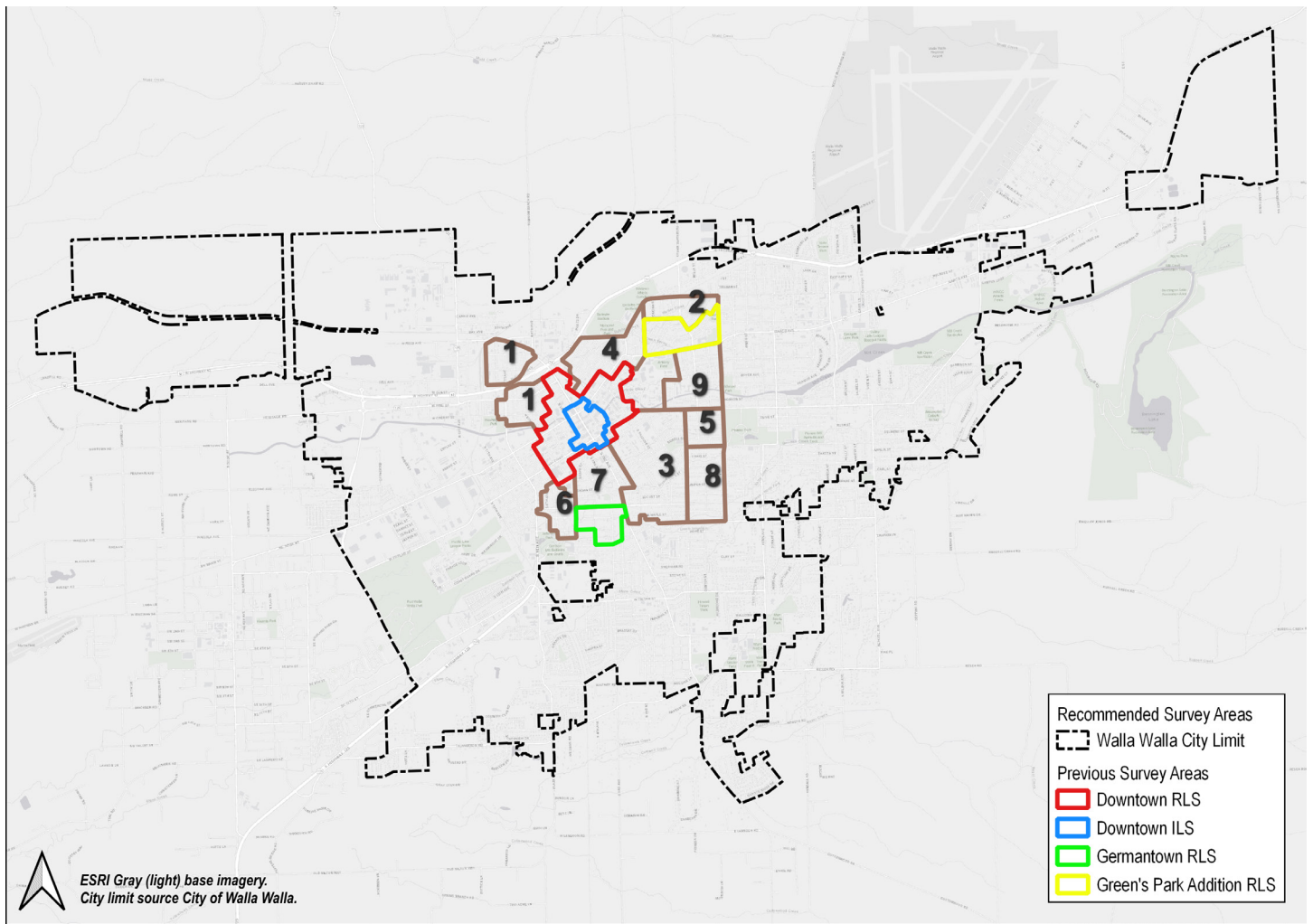


Map 8. URM Inventory.

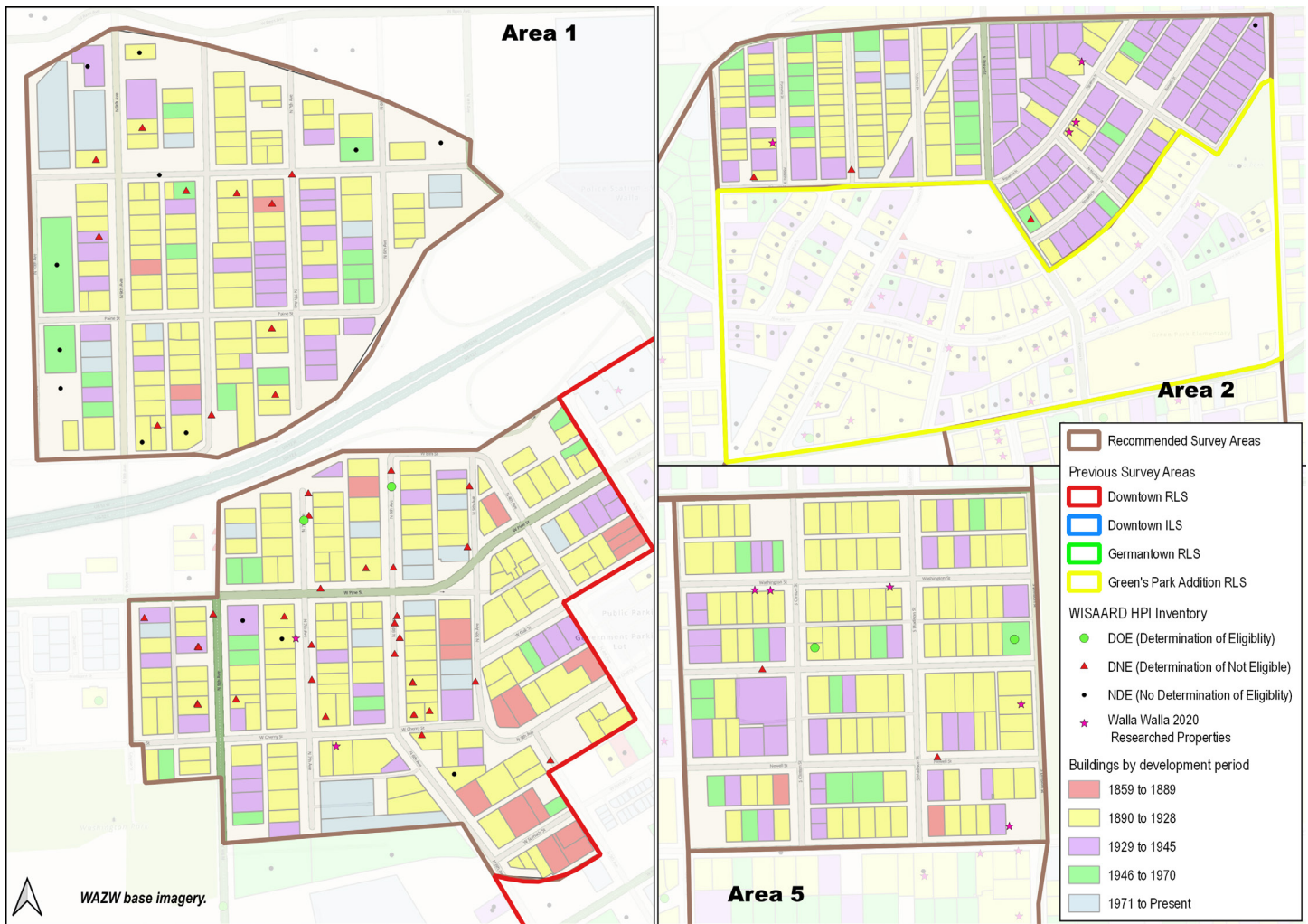
This map shows Walla Walla 2020 researched properties relative to previous CLG funded survey areas. Researched property points source Walla Walla 2020, <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fww2020.net%2Fwp-content%2Fuploads%2F2020-historic-properties-database-2018-3-8.xlsx&wdOrigin=BROWSELINK>



Map 9. Walla Walla 2020 researched properties.

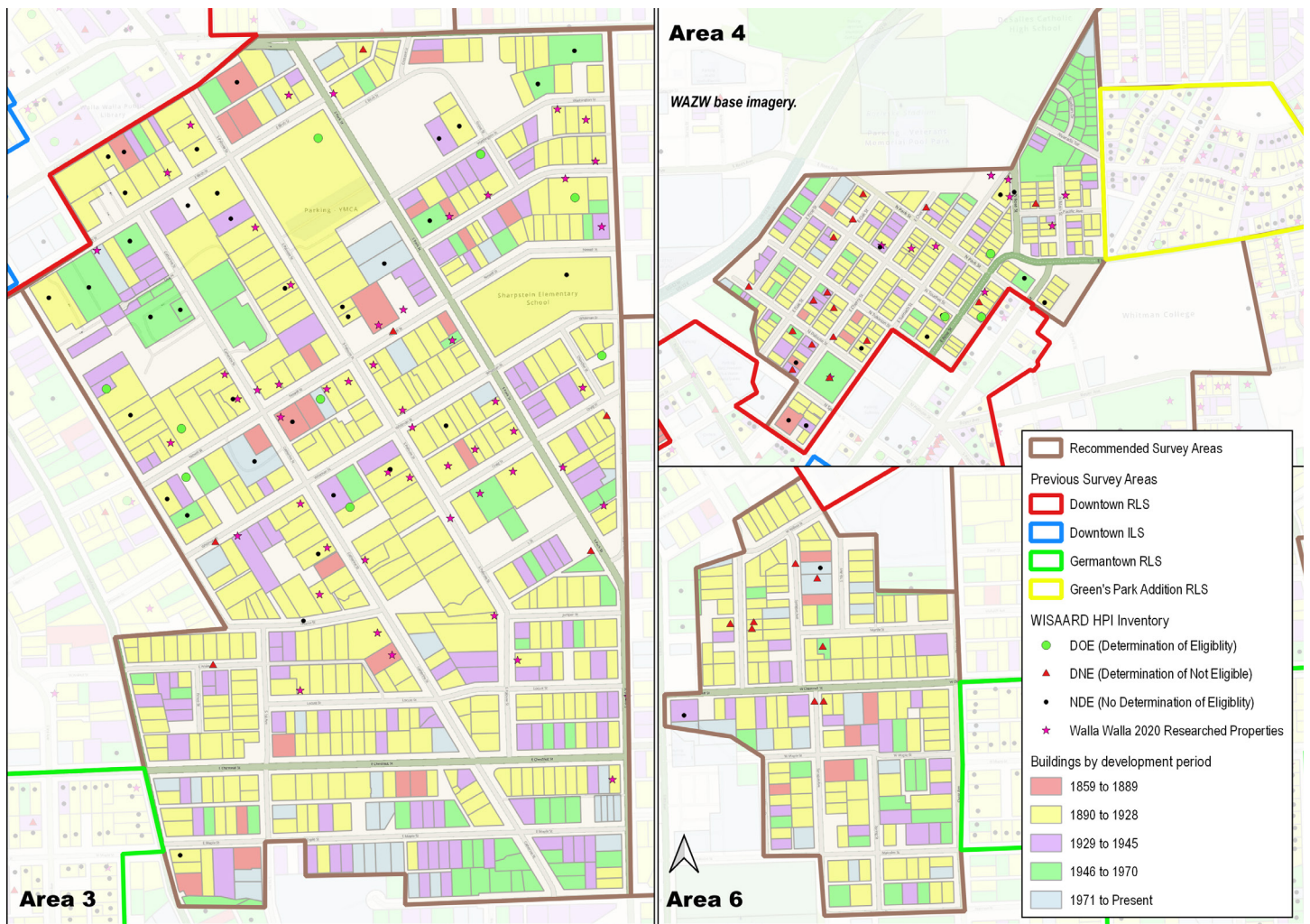


Map 10. Recommended survey areas.

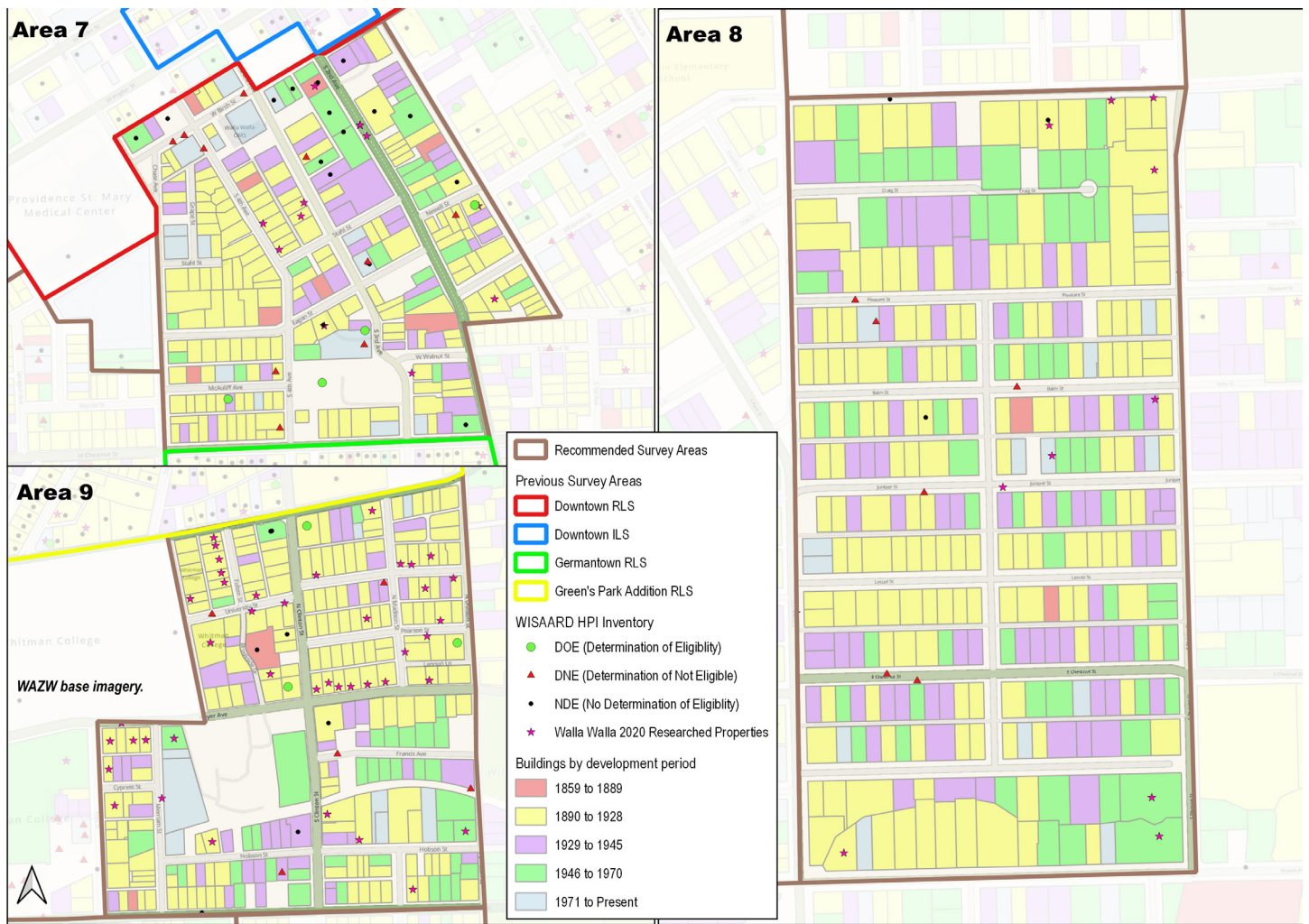


Map 11. Detailed survey area recommendations (areas 1,2, and 5).



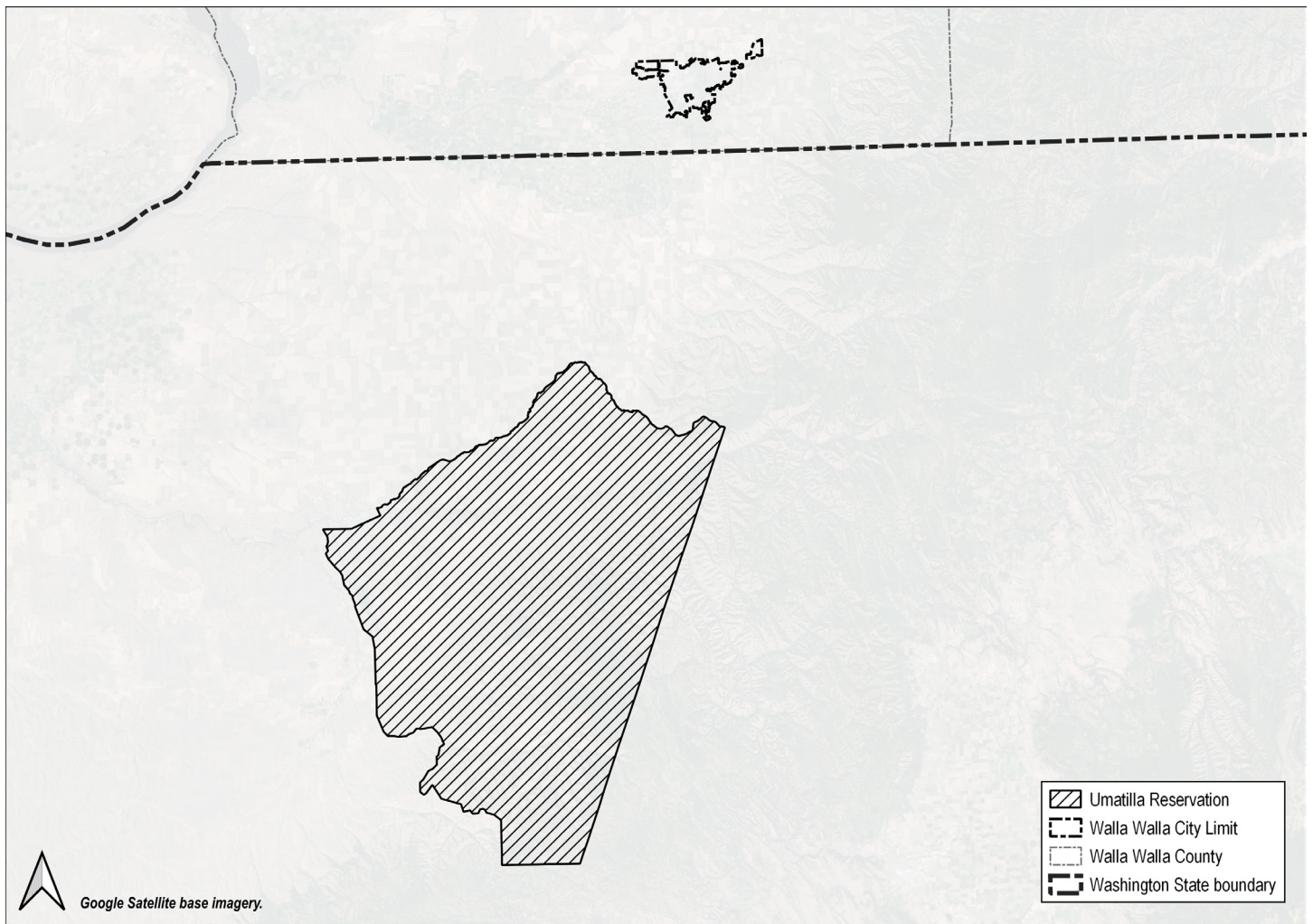


Map 12. Detailed survey area recommendations (areas 3, 4, and 6).



Map 13. Detailed survey area recommendations (areas 7, 8, and 9).





Map 14. Proximity of Umatilla Reservation to Walla Walla.

## 8.4. INCENTIVES PROGRAM REQUIREMENTS

The following outlines the process requirements and examples of eligible expenditures for the Federal Rehabilitation Tax Credit program.

Process requirements for the program:

- · DAHP consultation at the conceptual stage to discuss the potential project and identify any conflicts with the Secretary of the Interior's Standard for Rehabilitation. All subsequent application materials are submitted to DAHP for initial review and comment. Once complete, DAHP submits the application to NPS for review and final decision. Each stage of agency review takes 30 days. Construction should not start until the project has written Part 2 approval from NPS.
- · **Part 1:** Evaluation of Significance submittal if the building is contributing within a NRHP listed historic district or is not individually NRHP listed.
- · **Part 2:** Description of Rehabilitation submittal describing existing conditions, proposed work, and providing photographs and project drawings. This includes identification of whether this will be a single or phased project.
- · Amendment(s) submittal if there is a design change identified during construction that differs from what was approved by NPS.
- · Advisory Determination(s) submittal if the project is phased to document completion of a phase.
- · **Part 3:** Request for Certification of Completed Work to document the completed work was built as described in the Part 2 and any subsequent amendment.
- · **IRS Form 3468:** Investment Credit submitted by the taxpayer to claim the rehabilitation credit.

Eligibility requirements for the program:

- · The building must be individually listed in the National Register or certified through a Part 1 – Evaluation of Significance submitted to the NPS as contributing to the significance of a registered historic district. Additional information on the program is available through the NPS website. [<https://www.nps.gov/tax-incentives/before-you-apply.htm>]
- · Must meet the substantial rehabilitation test, in which the cost exceeds the greater of \$5,000 or the building's adjusted basis. The National Park Service provides the following formula to help determine if your project will be substantial:
  - »  $A - B - C + D = \text{adjusted basis}$
  - » A = purchase price of the property (building and land)
  - » B = the cost of the land at the time of purchase
  - » C = depreciation taken for an income-producing property
  - » D = cost of any capital improvements made since purchase
- · Work must comply with the Secretary of the Interior's Standards for Rehabilitation.
- · The property must be income producing and remain so for at least five years.

Eligible expenditures for the program per IRS 26 CFR 1.48-12 defined as: "In general, except as otherwise provided in paragraph (c)(7) of this section, the term "qualified rehabilitation expenditure" means any amount that is:

- · Properly chargeable to capital account (as described in paragraph (c)(2) of this section),



- Incurred by the taxpayer after December 31, 1981 (as described in paragraph (c)(3) of this section),
- For property for which depreciation is allowable under section 168 and which is real property described in paragraph (c)(4) of this section, and
- Made in connection with the rehabilitation of a qualified rehabilitated building (as described in paragraph (c)(5) of this section).”

The following items are generally eligible:

- Direct construction costs
- Soft costs including:
  - » Architect, engineer, historic preservation, and other specialty professions/trades fees.
  - » Construction permit fees.
  - » Development management fees, if these are documented to clearly show the cost to the company through payment of services for the work.
  - » Construction loan interest ad fee.
  - » Utilities, taxes, and insurance for the construction period.
  - » State sales tax.
- Site work that is necessary for rehabilitation, such as utilities, foundation work, clearing and disposal costs.
- Plumbing and electrical, all systems, including required exterior work (such as sewer lines), fire suppression systems, lighting fixtures, faucets, and sinks, supplies and materials.
- Furnishings that are built in. Tables or islands can be included if they are permanently attached to the floor.
- Appliances that are part of the building systems and permanent, such as water heaters, HVAC, and A/C units. The ducting and fire suppression tied to kitchen hoods, but not the hood itself.
- Carpeting if glued in place.
- Solar panels.

The following items are generally not eligible:

- Acquisition costs and legal fees. This would include fees for combining the parcels.
- Building enlargement costs, except to make the building fully usable (See Enlargements below).
- Costs related to valuation and permanent financing, as well as leasing and marketing, and overhead costs.
- Work related to, but outside of, the building, including sidewalks, paving for parking lots, and landscaping.
- Site work related to landscaping, new walls, paving for parking, sidewalks, accent lighting that is not mounted to the building, sprinkler systems.
- Security and alarm systems, including cameras, and table or floor lamps.
- Furnishings that are moveable.
- Appliances that are portable, such as commercial kitchen appliances, washers and dryers, ranges/ovens (even if wall mounted), dishwashers, range hood.

- Rugs and carpeting, if tacked in place, or tiles.
- Signage.
- Window treatments (blinds, curtains).

## 8.5. ORDINANCE LANGUAGE UPDATES

Add to the definitions in WWMC 2.27.030

*“Cultural resources” means resources associated with human manipulation of the environment and encompasses all the resources that are potentially eligible for listing in the National Register of Historic Places, that being sites buildings, structures, districts, and objects. This is inclusive archaeological sites, traditional cultural places, and built environment resources and is defined in the Washington State Standards for Cultural Resources Reporting.*

*“Integrity” means the ability of a resource to convey its significance through the following seven aspects of qualities that, in various combinations, define integrity: location, design, setting, materials, workmanship, feeling or association. Refer to Section VIII of the National Register Bulletin 15 “How to Apply the National Register Criteria for Evaluation” for additional guidance on evaluating integrity.*

Add the underlined language to WWMC 2.27.030(B) for clarity on the key difference between buildings and structures.

*A “building” is a structure constructed for habitation by human beings. This includes both residential and nonresidential buildings, main and accessory buildings.*

Add the underlined language to WWMC 2.27.030(AA) to facilitate property owner reference to the applicable WAC section.

*“Washington State Advisory Council’s standards for the rehabilitation and maintenance of historic properties” or “State Advisory Council’s standards” set forth in WAC 254-20-100 means the rehabilitation and maintenance standards used by the city historic preservation commission as minimum requirements for determining whether or not an historic property is eligible for special valuation and whether or not the property continues to be eligible for special valuation once it has been so classified. (Ord. 2019-38 § 1 (part), 2019: Ord. 2002-26 § 1, 2002).*

Add language that exempts archaeological and historical properties of religious and cultural significance to Indian Tribes (HPRCSIT) location information from being listed and publicized per RCW 42.56.300.

*WWMC 2.27.040(D)(1) Conduct and maintain a comprehensive inventory of historic resources within the boundaries of the city of Walla Walla and known as the city of Walla Walla historic inventory, and publicize and periodically update inventory results. To protect archaeological and historical properties of religious and cultural significance to Indian Tribes (HPRCSIT) their location information will not be listed or publicized per RCW 42.56.300.*

Add “tribal governments.”

*WWMC 2.27.040(D)(8) Establish liaison support, communication and cooperation with federal, state, tribal governments, and other local government entities which will further historic preservation objectives, including public education, within the local area.*

Provide a definition for “integrity.”

*WWMC 2.27.050(A) Criteria for Determining Designation in the Register. Any building, structure, site, object, or district may be designated for inclusion in the city of Walla Walla register of historic places if it is significantly associated with the history, architecture, archaeology, engineering, or cultural heritage of the community; if it has integrity as defined by location, design, setting, materials, workmanship, feeling or association; is at least fifty years old, or is of lesser age and has exceptional importance; and if it falls in at least one of the following categories:*

Language addition to provide clarity that archaeological site location information is exempt from public disclosure as per RCW 42.56.300.

*WWMC 2.27.050(B)(4) The historic preservation commission shall consider the merits of the nomination, according to the criteria in this section and according to the nomination review standards established in rules, at a public meeting. Adequate notice will be given to the public, the owner(s) and the authors of the nomination, if different, and lessees, if any, of the subject property prior to the public meeting according to standards for public meetings established in rules and in compliance with Chapter [42.30](#) RCW, Open Public Meetings Act. To protect archaeological and historical properties of religious and cultural significance to Indian Tribes (HPRCSIT) their location information will not be listed or publicized according to 42.56.300 RCW. Such notice shall include posting on the property and the city’s website. If the commission finds that the nominated property is eligible for the city register of historic places, the commission shall list the property in the register with the owner’s consent. In the case of historic districts, the commission shall consider a simple majority of property owners to be adequate for owner consent. The public, property owner(s) and the authors of the nomination, if different, and lessees, if any, shall be notified of the listing.*

Add language retaining a record of demolished WWRHP resources for historical research purposes.

*WWMC 2.27.060(C)(3) Demolition. A waiver of the certificate of appropriateness is required before a permit may be issued to allow whole or partial demolition of a designated city register of historic places property or in a city register of historic places historic district. The owner or his/her agent shall apply to the commission for a review of the proposed demolition and request a waiver. The applicant shall meet with the commission in an attempt to find alternatives to demolition. These negotiations may last no longer than forty-five calendar days from the initial meeting of the commission, unless either party requests an extension. If no request for an extension is made and no alternative to demolition has been agreed to, the commission shall act and advise the official in charge of issuing a demolition permit of the approval or denial of the waiver of a certificate of appropriateness. Conditions in the case of granting a demolition permit may include allowing the commission up to forty-five additional calendar days to develop alternatives to demolition. When issuing a waiver the board may require the owner to mitigate the loss of the register property by means determined*



*by the commission at the meeting. Any conditions agreed to by the applicant in this review process shall become conditions of approval of the permits granted. After the property is demolished, the commission shall initiate ~~removal of the property from the register~~ a change in status of the property to demolished, retaining the nomination and demolition request to provide a record of the change and information for historical research purposes.*

Language removal and additions for terminology consistency.

*WWMC 2.27.050(B): Process for Designating Properties or Districts to the City of Walla Walla Register of Historic Places.*

*WWMC 2.27.050(B)(1): Any person may nominate a building, structure, site, object, or district for inclusion in the ~~city register of historic places.~~*

*WWMC 2.27.050(B)(4): If the commission finds that the nominated property is eligible for the ~~city register of historic places,~~ the commission shall ~~list~~ designate the property in the register with the owner's consent.*

*WWMC 2.27.050(D): Effects of ~~Listing on~~ Designation to the Register.*

*WWMC 2.27.050(D)(1): ~~Listing on~~ Designation to the ~~city register of historic places~~ is an honorary designation denoting significant association with the historic, archaeological, engineering, or cultural heritage of the community.*

*WWMC 2.27.050(D)(4): All properties ~~listed on~~ designated to the ~~city register of historic places~~ may be eligible for special tax valuation on their rehabilitation.*

*WWMC 2.27.060: Review of changes to City of Walla Walla Register of Historic Places properties.*

*WWMC 2.27.060(A): No person shall change the general use, construct any new building or structure, or reconstruct, alter, restore, remodel, repair, move, or demolish any existing property on the ~~city register of historic places~~ or within an ~~local register historic district on the city register of historic places~~ without review by the commission and without receipt of a certificate of appropriateness, or in the case of demolition, a waiver, as a result of the review.*

*WWMC 2.27.060(C)(1): Requests for Review and Issuance of a Certificate of Appropriateness or Waiver. The historic preservation staff shall determine whether an application for a permit to work on a ~~city register of historic places~~ property or in a ~~city local register of historic places~~ historic district is exempt from review.*

*WWMC 2.27.060(C)(2): Commission Review. The owner or his/her agent (architect, contractor, lessee, etc.) shall apply to the commission for a review of proposed changes on a ~~city register of historic places~~ property or in a ~~city local register of historic~~*

~~places historic district and request a certificate of appropriateness or, in the case of demolition, a waiver.~~

WWMC 2.27.060(C)(3): Demolition. A waiver of the certificate of appropriateness is required before a permit may be issued to allow whole or partial demolition of a ~~city register of historic places~~ property or in a city local register ~~of historic places~~ historic district.

WWMC 2.27.070(C)(1): Historic Property Criteria. The class of property eligible to apply for special valuation in the city means all properties ~~listed on~~ designated to the city register of historic places or properties certified as contributing to a local register historic district which have been substantially rehabilitated at a cost and within a time period which meets the requirements set forth in Chapter 84.26 RCW.

The following needs some clarification or addition to reference the rules, this is 2.27.060(A) and the review of changes to a WWRHP listed property; also shows up under 2.27.060(C)(2)

*Information required by the commission to review the proposed changes is established in ~~rules~~ Bylaws.*

Change the following language to avoid confusion between monetary “value” and historic “value.”

WWMC 2.27.070(B)(5)(b) ~~Because of a loss of historic value~~ integrity resulting from physical changes to the building or site resulting in diminishment or loss of features which contribute to its designation.

## 8.6. BYLAWS LANGUAGE UPDATES

- Add the underlined language to link creation of the bylaws with the code subsection establishing that power and duty of the WWHPC: “These Bylaws establish the rules and procedures under which the Walla Walla Historic Preservation (WWHPC or Commission) executes those duties and functions set forth in Chapter 2.27 Historic Preservation Commission and as adopted by the WWHPC per WWMC 2.27.040(D)(18).”
- Change section 1 to “I” for consistency with subsequent sections.
- Remove subsection 1.2. as this duplicates WWMC 2.27.010.
- Delete the following from subsection 1.3.a. as it duplicates language in WWMC 2.27.040. “The Commission shall consist of seven (7) members. They must be appointed and/or re-appointed at the expiration of their term by the City Council. Appointments shall be for three (3) year terms.”
- Delete the following subsections from 1.5. as they duplicate language in WWMC 2.27.040(D): subsections a, b, c, and d.
- Delete the second period under subsection 1.6.a.ii. in the first sentence.
- Change “principles” to “participants” for clarity under subsection 1.6.a.v.
- Under Section II introduction paragraph add the underlined language to cross reference the WWMC: “Under the provisions of the Walla Walla Historic Preservation Ordinance (WWHPO, WWMC 2.27.050) the Walla Walla Historic Preservation Commission (WWHPC or Commission) is directed to initiate and maintain a Walla Walla Register of Historic Places (WWHPR or Register) and to review nominations to the Register.”
- Delete the following struck through language under Section II introduction paragraph as it duplicates WWMC 2.27.050.
  - » Any building, structure, site, object or district may be placed on the Register if:
  - » 1. The WWHPC determines that it meets WWHPO Criteria.
  - » Any individual, group of property owners or other interested group or association, City, or County Council member, Walla Walla Historic Preservation Commission member, or WWHPC may nominate a building, structure, site, object, or district for inclusion on the Register. Owner consent is required for placement on the WWHPR.
- Replace “WWMC 2.27” with WWMC 2.27.050” in subsection II.A.b.iii. to link directly to the applicable categories.
- Under Section III introduction paragraph add the underlined language to cross reference the WWMC: “Design Review is the process through which the Walla Walla Historic Preservation Commission (WWHPC or Commission) reviews proposed changes to Walla Walla’s historic resources under WWMC 2.27.060.”
- Delete the following language from subsection II.A.b.iii. and subsection II.A.c.ii.1. “or the revised standards for the City of Walla Walla.” There are no revised standards established and the U.S. Secretary of the Interior’s Standards for Rehabilitation are the standards used by CLGs, DAHP, and NPS.
- Delete the following language from subsection II.C. “When necessary, refer to these Standards to guide in the design review criteria.” as this language implies that consideration of the U.S. Secretary of the Interior’s Standards for Rehabilitation are optional in the review of a certificate of appropriateness.

- Add the following language to subsection II.C “The WWHPC hereby adopts the “Secretary of The Interior’s Standards for Rehabilitation (attached) and Guidelines for Rehabilitating Historic Buildings” for its use in reviewing and making decisions on Certificate of Appropriateness applications.”
- Under Section IV delete the following language as it duplicates WWMC 2.27.070(C)(1): “Only properties on the Walla Walla Register of Historic Places or contributing properties within the Walla Walla Historic District are eligible for special valuation.”
- Under IV.A.iii add the following language as a new subsection 1 and adjust number for the rest of the subsections. “After an application is referred to the WWHPC, staff will contact the applicant to request the information required per WWMC 2.27.070.C.2.
- Eligible rehabilitation expenditures are based on the IRS definition of “Qualified Rehabilitation Expenditure” (QRE), PL 97-34, Sec. 212(e)(2): IN GENERAL--The term “qualified rehabilitation expenditure” means any amount properly chargeable to capital account... AND ...does not include--(ii) COST OF ACQUISITION--the cost of acquiring any building or any interest therein. (iii) ENLARGEMENTS-- Any expenditure attributable to the enlargement of the existing building.
- Phased projects must identify the total scope of work, timeline for completion, and work to be completed in each phase with sufficient detail to match costs with completed work as each phase is submitted.”
- Add code reference: “Under the Historic Preservation Ordinance of the City of Walla Walla (WWMC 2.27.040.D subsections (5), (9)), the Walla Walla Historic Preservation Commission (WWHPC) is directed to:”
- Under VI change language: “under the National Historic Preservation Act Amendments ~~Act~~ of 1980”